

March 26, 2025



COLORADO

Department of Health Care Policy & Financing

Health First Colorado Behavioral Health Updates

Health First Colorado Behavioral Health Updates provides content relevant to the full spectrum of behavioral health services in Colorado. Feel free to share this information with other interested stakeholders!

Feedback, ideas, and questions are welcome and can be shared at hcpf_bhbenefits@state.co.us.

What's New

CCBHC Planning Grant Work Update

HCPF and Behavioral Health Administration (BHA) have begun their combined work on the CCBHC Demonstration Planning Grant to explore how the CCBHC model will complement the Colorado Safety Net System and promote Colorado's overall goal of integrated and accessible behavioral health care with sustainable funding practices.

CCBHC Subcommittee Members Needed to Inform Planning Grant

Working together to collect input, ideas, perspectives, and guidance from our community partners, members, individuals with experience receiving care and family members, providers, and state agency partners is vital for the success of this project.

Subcommittees will include subject matter experts from clinics and organizations who render care to the CCBHC Planning Grant's populations of focus, Colorado's priority populations, as well as urban, rural, and frontier communities to ensure input received is reflective of Colorado's geographic and cultural diversity.

- **Prospective Payment System and Finance Subcommittee.** [Register in advance.](#)
- **Certification and Provider Readiness Subcommittee.** [Register in advance.](#)
- **Quality Measure Data Management Subcommittee.** [Register in advance.](#)

Additional CCBHC Planning Grant stakeholder engagement opportunities:

- **Monthly CCBHC Stakeholder Forum:** Review progress and collect input on CCBHC Planning Grant efforts. Open to members, providers, individuals with lived experience and their families, advocates, state agencies, managed care entities, and anyone interested in learning more about the CCBHC model in Colorado. [Register in advance.](#)
- **CCBHC Steering Committee:** Formed to provide input through the CCBHC planning process, the committee will be guided through contractor consultation, state leadership, stakeholder engagement feedback and the work of the subcommittees. Open for public observation with time reserved for comments and questions. [Register in advance.](#)

Progress updates, detailed information, and resources about Colorado's CCBHC efforts are available on the HCPF [CCBHC webpage](#).

Benefits Spotlight

Supporting SUD Providers in the Transition to ASAM Criteria, 4th Edition Standards

Colorado is preparing to transition into alignment with the [American Society of Addiction Medicine \(ASAM\) Criteria 4th Edition Standards](#), effective July 1, 2026. HCPF and BHA continue to hold monthly listening sessions with substance use disorder (SUD) providers to gather feedback, questions, and concerns regarding the transition to ASAM 4. More information is posted on the [BHA website](#), including the registration link for upcoming sessions.

One way that HCPF and BHA are planning to support SUD providers is through a Provider Ambassador Program for SUD providers who currently deliver ASAM 3.2WM services. HCPF and BHA have contracted with Health Management Associates, Inc. (HMA) to provide direct technical assistance and resources to assist 3.2WM providers in preparing for the ASAM 4 transition. More information about the Provider Ambassador Program, and how to participate, will be posted on [HCPF's SUD webpage](#) in April.

FAQs/Clarifications of Coverage and Billing Questions

Eligibility for Enhanced Essential Safety Net Payments

Essential Safety Net Providers must obtain a full Essential Safety Net Approval from the BHA to qualify for enhanced [Essential Safety Net directed payments](#). According to [BHA 2 CCR 502-1 12.6.2.A](#) entities with a provisional approval are “unable to conform to minimum standards” of the safety net requirements and thus would not qualify for enhanced rates. This clarification in HCPF’s recognition of full Essential Safety Net Approvals is effective April 1, 2025. Please outreach hcpf_bhbenefits@state.co.us with any questions.

Mental Health Transitional Living Homes Informational Memo Released

An Informational Memo ([IM 25-007](#)) about Mental Health Transitional Living Homes (MHTL) was released February 14, 2024. The purpose of this Information Memo is to inform all service providers, case management agencies, members and interested stakeholders about the differences between MHTL homes Level 1 (Transitional Living) and Level 2 (Supported Therapeutic Transitional Living).

Access the MHTL Informational Memo directly [here](#), or find the document on HCPF’s [2025 Memo Series Communication](#) webpage. Questions can be directed to hcpf_bhbenefits@state.co.us.

Provider Type 35 is Discontinued

Effective January 1, 2025, the Community Mental Health Center Provider Type (PT 35) was replaced by the Comprehensive Safety Net Provider Type (PT 78). PT 35 was end dated and no claims will be paid to the PT 35 after December 31, 2024. Please review the requirements for the Comprehensive Safety Net Provider on the [Provider Type webpage](#). In accordance with House Bill 18-1282, newly enrolling and currently enrolled organization health care providers (not individuals) must obtain and use a unique National Provider Identifier (NPI) for each service location and provider type enrolled in the Colorado interChange. Questions can be directed to hcpf_bhcoding@state.co.us.

Non-Emergent Medical Transportation (NEMT) Update

Please use HCPF's current [NEMT Provider Directory webpage](#) to find NEMT providers and/or contact the Member Contact Center at 1-800-221-3943. If you are having trouble finding a provider, please email NEMT@state.co.us. If transportation issues are unresolved for Opioid Treatment Providers, please outreach hcpf_sudbenefits@state.co.us.

Stay up to date on NEMT news by frequently checking the [HCPF NEMT webpage](#).



Provider Self-Audit

HCPF encourages providers to be active participants in ensuring the financial integrity of our healthcare programs. As HCPF continues to explore an aberrant increase in behavioral health spending, providers are strongly encouraged to conduct internal self-audits and to disclose any overpayments of funds.

Examples of Improper Payments Suitable for Self-Audits include, but are not limited to:

- Services performed by an excluded individual or entity
- Billing errors
- System errors
- Up coding (billing with code where the payment amount is more than for the code which was used or was necessary)
- Unbundling bundled codes
- Unqualified person providing services
- Time based codes missing in and out or full amount of time spent on services in the record
- Signature and date missing on progress or services notes

If overpayments are identified during a self-audit, please follow the [self-disclosure process](#) to report the overpayments to HCPF and your Regional Accountable Entity.



Prohibition of Offering Gifts and Other Inducements to Members

To ensure Medicaid members have unbiased access to Medicaid services and to maintain the integrity of healthcare choices within the Medicaid program, providers are prohibited

from offering any form of gifts or other inducements to members. A Medicaid provider can give a member a small item like a calendar or a water bottle as a token of appreciation, however, money or anything expensive is prohibited. Medicaid providers are not allowed to offer gifts to members, worth more than \$15 each or \$75 in total per patient in a calendar year. Medicaid providers are not allowed to offer any cash or similar to cash gifts such as gift cards, money, or vouchers.

Action To Be Taken:

- Review and understand the standards for offering gifts and other inducements to beneficiaries.
- Ensure all inducements given to Medicaid members comply with the \$15 per item and \$75 in total per member in a calendar year. Don't offer cash or cash-equivalent gifts such as gift cards or vouchers.
- Apply the specified exceptions for copays, preventive care incentives, or safe harbor provisions only as defined in 42 CFR 1001.952.
- Report any non-compliant activities to the Medicaid Operations, Fraud, Waste and Abuse Division.

For more information on the prohibition of offering gifts and other inducements to Members, please review HCPF's Compliance Guidance on Offering Gifts and Other Inducements to Beneficiaries ([OM 24-015](#)) operational memo published on HCPF's [website](#).

Other Things Happening in Behavioral Health

HCPF Hospital Transparency Reports Webinar

Thank you to all who attended our recent Hospital Transparency Reports Webinar. These reports measure Colorado hospital profits, reserves, costs, expenses and the level of community benefit that tax-exempt hospitals offer their communities in lieu of paying taxes. Hospitals are essential pillars within the communities they serve. These reports provide insight into hospital financial health. The reports and materials are posted [on our website](#).

The National Correct Coding Initiative

Beginning July 1, 2025, HCPF is requiring Regional Accountable Entities (RAEs) to implement all National Correct Coding Initiative (NCCI) edits. The Centers for Medicare & Medicaid Services (CMS), created the NCCI to reduce improper payments stemming from incorrect

coding and billing practices. NCCI prevents reimbursement for inappropriate combinations of Current Procedural Terminology (CPT) codes.

The following are the three types of NCCI Edits:

- **Add-on Code (AOC)** edits ensure add-on codes are not billed without a primary procedure code.
- **Medically Unlikely Edits (MUEs)** prevent inappropriate payments when services are reported with an unusually high number of units of service.
- **Procedure to Procedure (PTP)** edits prevent code pairs that should not be reported together on the same date of service.

For more information on NCCI edits can be found on the [CMS website](#).

Connect with Us

Behavioral Health Provider Engagement Opportunities

Behavioral health providers are encouraged to participate in provider forums, meetings, and office hours. Below are a series of ongoing opportunities available. Many of these sessions require registration to allow for planning based on attendance and to prepare responses and presentations designed to address questions often submitted in advance.

View the full calendar of events on the [BHIC webpage](#).

Forums: Designed to be a space for presentation of information and discussion:

- CCBHC Stakeholder Forum - monthly on the last Wednesday 1:00 PM - 2:00 PM. [Register in advance](#).
- Behavioral Health Hospital Engagement Forum – Quarterly on the 2nd Friday 10:00 AM - 11:00 AM. [Register in advance](#).
- Independent Provider Network Forum - Quarterly on the 1st Friday 1:00 PM – 2:00 PM. [Register in advance](#).
- Peer Support Workforce Collaborative Meetings led by BHA – Quarterly on the 1st Thursday 12:00 PM - 1:30 PM. Register in advance through the [BHA's Stakeholder Calendar](#).
- SUD Forum – Quarterly on the 1st Wednesday 2:00 – 3:00 PM. [Register in advance](#).

Office Hours and Technical Assistance: Designed to be a “drop in” space for quick answers to issues best addressed by a brief discussion:

- *New:* Independent Provider Network (IPN) Office Hours - Monthly on the 2nd Wednesday 3-4pm. [Register in advance.](#)
- Crisis Office Hours – Monthly on the 2nd Tuesday 11:00 AM - noon. [Register in advance.](#)
- Supportive Housing Provider TA - Monthly on the last Thursday 2:00 – 3:00 PM. [Register in advance.](#)
- Mental Health Transitional Living Home – Level 2 Office Hours – Monthly on the last Thursday 3:00 – 4:00PM. **Advanced registration is not required.** Follow [this link](#) to attend.
- Peer Support Office Hours - Monthly on the 4th Thursday 12:00 – 1:00 PM. [Register in advance.](#)
- Safety Net Provider Office Hours – Monthly on the Fourth Friday 10:00 – 11:00 AM. [Register in advance.](#)
- SUD Provider Office Hours - Monthly on the 1st Wednesday 2:00 – 3:00 PM. [Register in advance.](#)



Share your feedback, ideas and questions with HCPF at hcpf_bhbenefits@state.co.us