

October 28, 2025



COLORADO

Department of Health Care Policy & Financing

Health First Colorado Behavioral Health Updates

Welcome to the Health First Colorado Behavioral Health Updates from the Department of Health Care Policy and Financing (HCPF).

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

Feedback Requested: H.R. 1 Survey

On July 4, 2025, the House Reconciliation bill (H.R.1), previously known as the “H.R.1 One Big Beautiful Bill Act,” was signed into law. The bill makes several changes to Medicaid that take effect over the next few years. All states, including Colorado, are required to follow these changes. We value your partnership in navigating this challenging time together. **Please complete [this survey](#)** to help us understand:

- Your concerns about H.R.1
- Where you go for trusted information
- How we can best share information with you

To submit a question or comment related to H.R.1, please use our [online form](#). You can also email HCPF at hcpf_HR1@state.co.us.

Update on the Health First Colorado Rendering Provider Oversight Policy

Thank you to everyone who provided feedback on the draft Supervision Policy for Medicaid Billable Behavioral Health Services. Over the past two months, more than 600 stakeholders and advocates shared valuable suggestions, observations, and recommendations.

We've published a [Summary of Stakeholder Feedback](#) that outlines the input received. Based on one of the most common recommendations, we're renaming the policy to the **Health First Colorado Rendering Provider Oversight (RPO) Policy** to better reflect its purpose and scope.

Because we received such thoughtful and extensive feedback, we're taking an additional week to ensure the final policy is as comprehensive and clear as possible. We expect to publish the updated RPO Policy in **early November** on the [Behavioral Health Policies, Standards, and Billing References webpage](#).

For questions, please contact hcpf_bhbenefits@state.co.us.

Thank you again for your continued partnership and engagement.

Benefit Spotlight

M-REACH Implementation Timeline Update

In accordance with House Bill 24-1045, the Department of Health Care Policy and Financing (HCPF) applied for federal authority to offer a limited set of reentry services, creating the Medicaid Reentry and Community Health (M-REACH) program. M-REACH is a new program under Colorado's 1115 "Expanding the Substance Use Disorder (SUD) Continuum of Care" Waiver (1115 Waiver). Implementation dates for the two phases of this program have been adjusted to account for delays in receiving necessary federal authority. Reimbursement for reentry services will begin on the following schedule:

- Phase 1 (State-run correctional facilities): January 1, 2026

- Phase 2 (Local correctional facilities): January 1, 2027

As a reminder, the correctional facility in which the member is incarcerated must have passed a Facility Readiness Assessment for reentry services to be billable. Please contact hcpf_cjj@state.co.us with any questions.

FAQs/Clarifications of Coverage and Billing Questions

Regional Accountable Entities to Resume Full Enforcement of Claims Processing Requirements

In order to facilitate timely payments to providers, the RAEs did not enforce all of the requirements to be met before processing claims. This means that some claims were processed even though they may not have adhered to the Medicaid capitated behavioral health program requirements. For example, information used to submit the claim (like specialty type or taxonomy code) did not match provider information in the Medicaid Management Information System (MMIS). To ensure HCPF's full compliance with all federal regulations, these requirements must be enforced. Not doing so could put Colorado's Medicaid federal funding at risk. HCPF is fully committed to following and enforcing all federal and state regulatory requirements.

More information about these changes will be included in the upcoming Provider Bulletin. Additional resources to navigate these changes will be available on the [ACC Provider and Stakeholder Resource Center webpage](#) in the coming weeks. Providers should [contact their RAE](#) with questions about whether they may be impacted by these upcoming changes or for help on making the appropriate changes to their claims.



Clarifying Behavioral Health Secure Transport (BHST)

Behavioral Health Secure Transportation (BHST) is a specialized Medicaid benefit designed exclusively for the safe and secure transport of individuals experiencing a behavioral health crisis. BHST is an unscheduled service available for members experiencing an active behavioral health crisis who need transport to an allowable facility. BHST providers must be enrolled with Health First Colorado, have appropriate licenses and permits, and be contracted with a RAE.

Refer to the [Secure Transport webpage](#) and the [State Behavioral Health Services Billing Manual](#) for more information on allowable transport within the BHST benefit.



New Drug Testing Unit Limitations and Documentation Requirements for Substance-Specific Confirmatory Tests, HCPCS G0480-G0483:

As of October 10, 2025, the following limits are effective for substance-specific confirmatory tests:

- Healthcare Common Procedure Coding System (HCPCS) codes G0480-G0483 have a unit limit of sixteen (16) per adult member (21+) per state fiscal year (July 1 through June 30).
- Soft limit applies to children, access to additional testing as clinically appropriate with a Prior Authorization.

All documentation, including the order for the drug test, the clinical indication/medical necessity, and the lab results must be maintained in the patient's medical record.

Please [review the video](#) explaining the proposed changes and project timeline and please submit your feedback in the [feedback form](#). HCPF will accept feedback on the proposed policy until December 12, 2025.

Contact Sarah Kaslow at sarah.kaslow@state.co.us with any questions.



Peer Support Professional Certification Requirements: Timeline and Definition

In June 2025, the [Medicaid Sustainability Memo](#) outlining changes to Peer Support was published. The [State Medicaid Director letter \(SMDL\) #07-011](#) indicates that states must determine the minimum training and certification criteria for peer support providers. HCPF is implementing the following policy related to Peer Support Professional certification requirements:

- Effective January 1, 2026, all Peer Support Professionals delivering Medicaid behavioral health services must either be certified or will be certified by July 1, 2026, to be eligible for reimbursement for delivering peer support services.
- Agencies must sign and submit an attestation to their Regional Accountable Entity (RAE) or RAEs by January 1, 2026, indicating that all Peer Support Professionals are either certified or are in the process and will be certified by July 1, 2026.

HCPF follows [Behavioral Health Administration \(BHA\)](#) rule regarding the definitions of training and certification requirements for Peer Support Professionals.

Stakeholders can ask questions and give feedback through the quarterly [Peer Support Forums](#) and [Peer Support Office Hours](#), and by contacting hcpf_peerservices@state.co.us.

Reminder: Provider Type and Specialty 64/477 ending December 31, 2025

Please be advised that Specialty 477 - Substance Use Disorder - Clinics will no longer be a valid specialty for Provider Type 64 - Substance Use Disorder (SUD) Continuum after **December 31, 2025**. In order to keep Provider Type 64 current and in good standing, a specialty designating a specific American Society of Addiction Medicine (ASAM) level is needed. Refer to the specific specialties on the [Find Your Provider Type web page](#). No further action is needed if your Provider Type 64 enrollment already has a specialty designating an ASAM level. Specialty 477 will be removed from your enrollment automatically after December 31, 2025. Enrollments for Provider Type 64 with no other specialty attached by December 31, 2025, will be terminated.

Contact hcpf_bhbenefits@state.co.us with any questions.

Other Things Happening in Behavioral Health

Certified Community Behavioral Health Clinics (CCBHCs) Planning Grant Updates

CCBHC Planning Grant Stakeholder Engagement Scheduling Changes

The following meeting/forum scheduling changes have been made to accommodate upcoming holidays and conflicting end-of-year requirements, priorities, and scheduling.

- The CCBHC Monthly Stakeholder Forum on November 26, 2025, will be cancelled and the CCBHC Steering Committee meeting on November 24, 2025, will be rescheduled to November 17, 2025, at 3:00 p.m.
- All CCBHC Planning Grant Stakeholder Engagement meetings and forums will be canceled for December 2025.
- CCBHC Planning Grant Stakeholder Engagement will be continued into January 2026 to ensure continuity of communication.

Please update calendars accordingly as Zoom does not have the functionality to automatically update calendar platforms.

If you are not yet registered for the CCBHC Monthly Stakeholder Forum or the CCBHC Steering Committee meeting, please register at the [CCBHC Planning Grant Webpage](#).

CCBHC Planning Grant Memorandums

Please continue to check the [Behavioral Health Administration \(BHA\) Memorandum Webpage](#) for updated memorandums and communications regarding planned policies and infrastructure for CCBHC services in Colorado. For additional details and reference materials, providers and stakeholders are encouraged to explore the [CCBHC Planning Grant Webpage](#).

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 [Behavioral Health Initiatives and Coverage Office webpage](#).

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

- Behavioral Health Hospital & Residential Facility Forum. Quarterly (First month of the quarter) on the third Thursday from 12 p.m. to 1 p.m. [Register](#) in advance.
- CCBHC Stakeholder Forum. Monthly on the last Wednesday from 1 p.m. to 2 p.m. [Register](#) in advance.
- Independent Provider Network (IPN) Forum. Quarterly on the first Friday from 1 p.m. to 2 p.m. [Register](#) in advance. (June, September, and December)
- SUD Forum. Quarterly (first month of the quarter) on the first Wednesday from 2 p.m. to 3 p.m. [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:

- Independent Provider Network (IPN) Office Hours. Monthly on the second Wednesday from 3 p.m. to 4 p.m. [Register](#) in advance.
- Safety Net and Crisis Office Hours. Monthly on the second Tuesday from 12 p.m. to 1 p.m. [Register](#) in advance.
- Supportive Housing Provider Office Hours. Monthly on the last Thursday from 2 p.m. to 3 p.m. [Register](#) in advance.
- Mental Health Transitional Living Home Level 2 Office Hours. Monthly on the last Thursday from 3 p.m. to 4 p.m. Advanced registration is not required. Follow [this link](#) to attend.
- Peer Support Office Hours. Monthly on the fourth Thursday from 12 p.m. to 1 p.m. [Register](#) in advance.
- SUD Provider Office Hours. Monthly on the first Wednesday from 2 p.m. to 3 p.m. [Register](#) in advance.

Email hcpf_bhbenefits@state.co.us to share feedback, ideas, and questions with HCPF.



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

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