

January 13, 2026



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!

What's New

New Regional Accountable Entity (RAE) Network Management Provider Memo Released

A Regional Accountable Entity (RAE) Network Management Provider Memo has been released. The memo details how the RAEs will focus their provider

recruitment and network expansion efforts based on regional need and quality of care. Instead of offering a contract to any willing provider, RAEs will prioritize providers that fill network gaps and are able to demonstrate quality outcomes when building their networks.

Find the RAE Network Management Provider Memo in the Resources section of the [Behavioral Health web page](#).

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

Health First Colorado Behavioral Health Rendering Provider Oversight (RPO) Policy: Final Version Posted - Attestation Due January 1, 2026

We want to once again extend a heartfelt thank you to everyone who took the time to submit feedback and ask clarifying questions regarding the Health First Colorado Behavioral Health Rendering Provider Oversight (RPO) policy. Your participation was invaluable in shaping clear, effective policies that support both providers and members.

The final version of the RPO Policy and a document answering Frequently Asked Questions are now available on the [Behavioral Health Policies, Standards and Billing References webpage](#).

All Medicaid enrolled providers who are subject to this policy must submit the attestation annually by January 1 to any RAE the billing provider is contracted with, or to HCPF directly in the case of providers delivering certain 1115 Waiver services, confirming adherence to rules and standards outlined in the policy.

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

Behavioral Health (BH) Peer Support Professional Certification Requirements: Attestation Required January 1, 2026

The [State Medicaid Director \(SMD\) Letter #07-011](#) indicates that states must determine the minimum training and certification criteria for professionals delivering peer support services in a behavioral health context. HCPF follows the definitions of training and certification requirements for Peer Support Professionals in [Behavioral Health Administration \(BHA\) rule](#). In alignment with the [Medicaid Sustainability Memo](#) published in June 2025, agencies must sign and submit [this attestation](#) to their RAE(s) by January 1 annually, indicating that all Behavioral Health Peer Support Professionals are either certified or are in the process of becoming certified. Additional information is posted on the [Behavioral Health Policies, Standards and Billing References webpage](#) under the section titled Behavioral Health Peer Support Policy.

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

Health-Related Social Needs Community Webinar on the Final HB23-1300 Feasibility Report

HCPF invites you to a webinar on **Wednesday, February 11, from 10 to 11 a.m.**, to hear the results of the HB23-1300 feasibility study.

[Colorado House Bill 23-1300](#), Continuous Eligibility Medical Coverage, directed HCPF to study the feasibility of expanding health-related social needs (HRSN) services through Colorado's Medicaid program. Over the past two years, HCPF has engaged stakeholders, examined opportunities, and expanded HRSN programs through 1115 waiver authority.

HCPF partnered with the Colorado Health Institute, a nonpartisan research organization, to author the study. The report examines the costs and benefits of potential expansions related to continuous coverage for Medicaid populations, as well as the need, cost considerations, and evidence for HRSN services related to housing, food and nutrition, extreme weather, and social and community support. The report also identifies the populations for whom these services are most impactful.

Attend this webinar to learn about the study findings and to review past and upcoming milestones related to HRSN expansions at HCPF.

Meeting date and time: Wednesday, February 11, from 10 to 11 a.m.

- **Intended audiences: All stakeholders, including nutrition, housing, coverage, violence prevention, and other providers, members, advocacy groups, state agencies.**

Registration and location: The meeting will be virtual via Zoom. [Register](#) in advance or at the start of the webinar. Once you register, you will receive a unique link to join the meeting. It is tied to your registration and will not work for anyone else.

If you are unable to attend, the meeting recording will be posted to the [HRSN website](#) after the meeting.

Benefit Spotlight

Colorado's Certified Community Behavioral Health Clinic (CCBHC) Ongoing Work

2026 CCBHC Work in Colorado

The CCBHC Planning Grant has been granted a No-Cost Extension (NCE) through June 30, 2026 from the Substance Abuse and Mental Health Administration (SAMHSA). Please join the following stakeholder engagements to contribute input that will continue to shape the future of CCBHCs in Colorado:

- **Prospective Payment System Financial Guardrail Discussion**

January 23, 2026, from 11 a.m. to 12 p.m. [Register here](#) to attend.

Topics will include the development of the Prospective Payment System (PPS) Guardrails Plan, including PPS payment structure, financial and data reporting requirements, quality requirements, monitoring and oversight processes, and potential impacts of noncompliance. A PPS Guardrails draft plan will be published in early 2026.

- **Colorado CCBHC Planning Grant Steering Committee**

Monday, January 26, 2026, at 3:00 p.m. [Register here](#) to attend.

Topics will include a review of 2025 accomplishments and an overview of plans for 2026. The CCBHC Steering Committee meeting will occur regularly on the last Monday of each month at 3:00 p.m. through May of 2026.

SUD Residential Levels of Care Utilization Management

Beginning in January 2021, members began receiving expanded SUD services through the 1115 waiver. To support the rollout of these new benefits, HCPF

implemented minimum length of stay requirements. These requirements were designed to aid provider and RAE education and ensure a smooth transition. Over the past four years, we've made meaningful progress in expanding access and improving service delivery.

Effective March 1, 2026, HCPF will remove the minimum length of stay requirements. This change empowers RAEs to tailor treatment durations to each member's unique needs, aligning with a core principle of The American Society of Addiction Medicine (ASAM) Criteria: that treatment should be individualized based on patient needs and preferences.

If a RAE requires a prior authorization review for residential or inpatient SUD treatment, the RAE must allow providers up to twenty-four (24) hours post admission to request authorization.

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

New Policy Statement on RAE Residential Youth Care Coordination

A new [Policy Statement](#) is available that identifies the expectations of Regional Accountable Entity (RAE) Care Coordination engagement and participation with and for pediatric members under 21 years of age admitted to residential behavioral health treatment facilities. These expectations will ensure appropriate and timely care is supported by the Health First Colorado member's care team and enhance access to the full spectrum of Medicaid-covered behavioral health treatment services for members with high-acuity behavioral health needs during and following residential treatment (e.g., Colorado System of Care identification and referrals). The guidance became effective on December 8, 2025.

The full [Policy Statement](#) is available on the [HCPF Residential and Inpatient Services webpage](#) under Youth Residential Services.

FAQs/Clarifications of Coverage and Billing Questions

New Frequently Asked Questions (FAQ) on Prior Authorization and Retrospective Reviews for Outpatient Psychotherapy Released

A Frequently Asked Questions (FAQ) on Prior Authorization and Retrospective Reviews for Outpatient Psychotherapy has been released to answer the questions received from providers, advocates, and legislators about the recent guidance for the RAEs on utilization management of outpatient psychotherapy services. The guidance directed the RAEs to develop strategies to address the unmanageable growth in outpatient psychotherapy and ensure services are medically necessary. This included an expectation that the RAEs establish processes to review outpatient psychotherapy that exceeds 24 sessions in a state fiscal year (July through June).

The FAQ provides additional information about the scope and goals of the policy, and will assist the RAEs and providers in implementing the change.

The FAQ and related RAE Transmittal guidance are posted in the Resources section of the [Behavioral Health web page](#).

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

Reimbursement for Electroconvulsive Therapy (ECT)

Beginning January 1, 2026, RAEs will begin outreaching and adjusting contracts for electroconvulsive therapy (ECT). Effective April 1, 2026, HCPF will enforce the revised reimbursement requirements detailed below for ECT.

- ECT related anesthesia must be incorporated into the reimbursement rate for ECT. 00104, Anesthesia for Electroconvulsive Therapy, will be phased out for use under the capitated behavioral health benefit.
- ECT cannot be reimbursed outside of per diem payments for inpatient psychiatric services.

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

Sunsetting H0006, Alcohol and/or Drug Service - Case Management

HCPF is sunsetting procedure code H0006, Alcohol and/or Drug Service - Case Management, effective December 31, 2025, and will no longer reimburse for this procedure code. The services covered under this SUD specific code are able to be delivered more generally under other existing behavioral health case management codes. Please refer to the [State Behavioral Health Services \(SBHS\) Billing Manual](#) for other case management procedure codes.

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

Reminder for Providers to Reference the Current Billing Manual

Please make sure that you are using the most up-to-date SBHS Billing Manual by using the manual that is currently on the [HCPF SBHS website](#). This will ensure you have the most accurate billing information.

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

Updated Mobile Crisis Response (MCR) Service Definition

[The Mobile Crisis Response \(MCR\) Service Definition](#) has been updated.

MCR is a service intended to offer de-escalation and stabilization to individuals in a self-defined behavioral health crisis to decrease the use of the emergency department, inpatient care, and unnecessary arrest for individuals whose needs can be met in the community. This service definition outlines key components that comprise a MCR program and is intended for use by agencies that are eligible for Behavioral Health Administration (BHA) endorsement and enrollment as a Colorado Medicaid provider.

Providers should review the revised definition, which has removed content that is now codified in Behavioral Health Administration (BHA) rule.

The [updated MCR Service Definition](#) is available on the [Mobile Crisis Response web page](#).

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

Reminder: BHA License Renewal Required

Behavioral Health Administration (BHA) licenses expire annually. It is the provider's responsibility to ensure their license is renewed on time and the updated license is uploaded to the HCPF [Provider Web Portal](#) (hosted by Gainwell). If the license is expired or not uploaded in the Provider Portal, claims processing and payment may be interrupted.

Providers should verify their license status and documentation to avoid any delays in payment.

Additional information is available on the [Provider Enrollment web page](#).

Contact hcpf_bhbenefits@state.co.us with any additional questions or issues.

Reminder: Provider Type and Specialty 64/477 No Longer Valid

Please be advised that Specialty 477 - Substance Use Disorder - Clinics is no longer a valid specialty for Provider Type 64 - Substance Use Disorder (SUD) Continuum, as of December 31, 2025. ***Claims submitted with a date of service after December 31, 2025, under Provider Type 64 Specialty 477, will be denied.***

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 was automatically removed from provider enrollment on December 31, 2025. Enrollments for Provider Type 64 with no other specialty attached by December 31, 2025, were terminated.

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

Other Things Happening in Behavioral Health

Access to Behavioral Health Services for Individuals under Age 21 Report

HCPF has submitted a report on access to behavioral health services for individuals under age 21 to the General Assembly. This report provides an analysis of utilization of a limited set of behavioral health services covered under Health First Colorado that went into effect July 1, 2024, per [Senate Bill 23-174](#).

Read the full report on the [Legislator Resource Center](#).

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.
- Independent Provider Network (IPN) Forum. Quarterly on the first Friday from 1 p.m. to 2 p.m. [Register](#) in advance. (March, 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:

- Behavioral Health Hospital & Residential Facility Office Hours. Monthly on the third Thursday from 12 p.m. to 1 p.m. [Register](#) in advance.
- Independent Provider Network (IPN) Office Hours. Monthly on the first Friday of the month from 1 p.m. to 2 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.
- Peer Support Office Hours. Monthly on the fourth Thursday from 11:30 a.m. to 12:30 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.

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