

August 28, 2025



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# 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](mailto:hcpf_bhbenefits@state.co.us).

## What's New

### HCPF Annual Stakeholder Webinar

Thank you to the more than 2,400 attendees who joined HCPF leaders for our Annual Stakeholder Webinar on August 12.

We discussed emerging federal threats to Medicaid, our processes to tackle them, state budget challenges, Medicaid cost trend drivers, and priorities for fiscal year 2025-26. Materials from the webinar are on our [website](#). We also invite you to bookmark our [Understanding the Impact of Federal Changes to Medicaid website](#) where we will share key implementation information and post updated fact sheets as well as opportunities to engage with us further. You can send questions to [hcpf\\_HR1@state.co.us](mailto:hcpf_HR1@state.co.us) and, if you have not already, please sign up for the [At A Glance Newsletter](#) to keep informed. Thank you again for your partnership and engagement as we work together in this chapter of dynamic change.

### Share Thoughts on Senate Bill 23-174

HCPF is seeking community insight on the experience with [Senate Bill \(SB\) 23-174 Access to Certain Behavioral Health Services](#).

In 2023, the Colorado Legislature passed SB 23-174 that required HCPF to provide access to a limited set of behavioral health services to members under

the age of 21 without a covered diagnosis. The legislation detailed service categories that must be included under this coverage, and HCPF engaged stakeholders to identify the specific service codes that are included. This coverage policy went into effect July 1, 2024. Visit HCPF's [Senate Bill 23-174: Coverage Policy web page](#) for additional information and resources.

### **How has SB 23-174 transformed practices/organizations and communities?**

[This brief survey](#) is designed for participants to share the difference SB 23-174 has made for providers and for members under 21 without a covered diagnosis. This insight will help HCPF understand the real-world impact of this legislation. Please share any input by September 7.



### **Medicaid Reentry and Community Health (M-REACH) Update**

In accordance with [Colorado House Bill \(HB\) 24-1045](#), the Department of Health Care Policy and Financing (HCPF) applied for federal authority to offer a limited set of reentry services under Colorado's [1115 "Expanding the Substance Use Disorder \(SUD\) Continuum of Care" Waiver](#) (1115 Waiver). On January 13, 2025, the Centers for Medicare and Medicaid Services (CMS) approved that waiver amendment authorizing reentry services.

HB 24-1045 set an implementation date of July 1, 2025, however, HCPF must wait to receive approval of additional federal authority before M-REACH may be implemented. Updates will be provided as they become available.

Visit the [Health First Colorado and Criminal Justice Involved Populations web page](#) for more information.

## **FAQs/Clarifications of Coverage and Billing Questions**

### **Peer Support Professionals Certification Update**

In June 2025, HCPF published the [Medicaid Sustainability Memo](#) outlining changes to Peer Support Professional's certification requirements that would require additional documentation of Peer credentialing by January 1, 2026.

After consideration of stakeholder feedback, HCPF is implementing the following policy:

- Effective January 1, 2026, all Peer Support Professionals delivering Medicaid behavioral health services must either be credentialed or will be credentialed by a nationally recognized organization 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 the Peer Support Professional is either credentialed or is in the process and will be credentialed by July 1, 2026.

HCPF will provide opportunities for stakeholders to give feedback on these changes, both in our quarterly Peer Support Forums, as well as the opportunity to share written feedback for all stakeholders unable to attend. HCPF will host the first Peer Support Forum on September 25, 2025, from 11:30 a.m. to 12:30 p.m. and the topic will be "Peer Support Professional Certification." Please [register through Zoom](#) to attend the quarterly Peer Support Forums.

HCPF also hosts monthly Peer Support Office Hours on the fourth Thursday of the month from 11:30 a.m. to 12:30 p.m. (please note the time change) to answer questions from providers regarding Medicaid reimbursement for Peer Support services. There is no structured presentation during Office Hours so please only register if you have a question and list your question on the [Zoom registration form](#).

#### **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](mailto:hcpf_bhbenefits@state.co.us) with any questions.

### **Clarification: Continuous Eligibility Guidance Changes from CMS**

In the July 2025 Health First Colorado Behavioral Health Updates newsletter, HCPF shared the below update on continuous eligibility:

On July 17, 2025, the Centers for Medicare and Medicaid Services (CMS) sent state Medicaid programs a letter saying that CMS will no longer approve new or renewed 1115 waivers for continuous eligibility in Medicaid or CHP+.

Continuous eligibility allows certain children or adults to keep their coverage even if their income or household size changes temporarily.

Colorado can no longer move forward with major components of Continuous Eligibility Medical Coverage ([House Bill 23-1300](#)), passed in 2023. Colorado was preparing to launch continuous eligibility on January 1, 2026 for:

- Children ages 0–3 for 36 months (up from 12), and
- Adults recently released from state prison for 12 months, regardless of income changes.

These changes were part of Colorado's approved 1115 waiver for expanding substance use disorder (SUD) services. However, the new CMS policy, issued on July 17, blocks implementation.

We remain committed to finding new ways to support continuous access to care and will continue to advocate for policies that reflect Colorado's values of equity, compassion, and opportunity for all.

**Please note:** All other approved components of the 1115 waiver, including Reentry Services, are continuing towards implementation as planned.

Continuous eligibility is the only component of the 1115 waiver that will not be included beginning January 1, 2026.

### **Discontinuation of Behavioral Health Outpatient State Directed Payments Stakeholder Engagement Webinar Recording Available**

The Behavioral Health Administration (BHA) and the Department of Health Care Policy and Financing (HCPF) hosted three meetings in July to discuss the change to the behavioral health directed payment policy for Medicaid reimbursement rates for Essential Safety Net Providers. These meetings were an opportunity for HCPF and BHA to provide clarity and address some of the questions that have been raised. Thank you to all those who joined and provided input and feedback.

The recording is now available in the Resources section on [HCPF's Behavioral Health web page](#). Appendix D of the July 2025 edition of the [State Behavioral Health Services Billing Manual](#) has been updated to reflect these changes.

Contact [hcpf\\_bhbenefits@state.co.us](mailto:hcpf_bhbenefits@state.co.us) with any questions.

### **The National Correct Coding Initiative: H0005 & H0006**

Beginning July 1, 2025, HCPF is requiring RAEs to implement all National Correct Coding Initiative (NCCI) edits. Providers have reached out for clarification around H0005 (group counseling by a clinician) and H0006 (SUD Targeted case management).

HCPF is enforcing the 1 unit (1 unit = 1 hour/day) limit set by NCCI for H0005. To support efforts to simplify billing, HCPF is sunsetting H0006 as of December 31, 2025; claims for H0006 with dates of service on or after January 1, 2026 will deny and all behavioral health targeted case management services must be billed under T1017 (Behavioral Health Targeted Case management). Providers can begin to transition to using T1017 immediately, if they are contracted with the RAE(s) to provide T1017.

HCPF will not enforce the NCCI edit for H0006 prior to its sunsetting and **is aligning edits for H0006 with CO MUE limit, of 4 units per day (1 unit = 15 minutes/day) for T1017.**

For additional information visit the CMS [NCCI for Medicaid](#) web page for all NCCI edits.

#### **Reminder: Notification of Colorado Medically Unlikely Edits (CO MUEs)**

Effective October 1, 2025, HCPF is applying Colorado specific Medically Unlikely Edits (CO MUEs) and Procedure-to-Procedure (CO PTP) edits for services that do not have National Correct Coding Initiative (NCCI) edits.

More information, including the list of Colorado MUEs, is located on the [HCPF Behavioral Health Policies, Standards and Billing References webpage](#).

Contact [hcpf\\_bhbenefits@state.co.us](mailto:hcpf_bhbenefits@state.co.us) with any questions.



## Other Things Happening in Behavioral Health

### **Certified Community Behavioral Health Clinic Planning Grant Stakeholder Engagement and Feedback Opportunities**


The Behavioral Health Administration (BHA) and the Department of Health Care Policy and Financing (HCPF) continue to learn from our stakeholders as we work together on the Certified Community Behavioral Health Clinics (CCBHCs) Planning Grant Project. We are seeking feedback from all stakeholders, including providers, advocates, those who receive behavioral health services, and their loved ones. Please join us for any of the following stakeholder engagement opportunities:

- CCBHC Stakeholder Forum. Monthly on the last Wednesday from 1 p.m. to 2 p.m. [Register](#) in advance.
- CCBHC Steering Committee. Monthly on the last Monday from 3 p.m. to 4 p.m. [Register](#) in advance.
- Prospective Payment System and Finance Subcommittee. Monthly on the third Wednesday at 2 p.m. [Register](#) in advance.
- Certification and Provider Readiness Subcommittee. Monthly on the first Tuesday at 2 p.m. [Register](#) in advance.
- Quality Measure Data Management Subcommittee. Monthly on the third Tuesday of each month at 2 p.m. [Register](#) in advance.

Visit the [CCBHC web page](#) for more information.


### **Colorado System of Care Potential Provider Forums:**

Colorado System of Care (CO-SOC) is looking to expand and grow the provider network! This initiative focuses on CO-SOC Enhanced High Fidelity Wraparound (EHFW) using the National Wraparound Implementation Center (NWIC) Model, Enhanced Multisystemic Therapy (EMST) and Enhanced Functional Family Therapy (EFFT). By strengthening the workforce and ensuring program fidelity, this collaboration aims to enhance services to our most vulnerable children and youth, empowering them to lead healthier, more fulfilling lives. While specifically targeting agencies/providers who are wanting to join the CO-SOC, these forums are open to anyone! No registration is needed. To learn more, please visit the [Intensive Behavioral Health Services for Medicaid \(IBHS\) website](#).




### **Why NWIC for Enhanced High Fidelity Wraparound?**

NWIC supports states, communities, and organizations, to implement Enhanced High Fidelity Wraparound (EHFW). The work is tailored to build sustainable local capacity to provide model-adherent EHFW, thereby increasing positive outcomes for children and their families. NWIC's training and coaching support is designed to build sustainability in a state or community for the local wraparound workforce. The [Title IV-E Prevention Services Clearinghouse lists Intensive Care Coordination Using High Fidelity Wraparound/HFW](#) as a promising practice specific to the NWIC Model.




### **What is Multisystemic Therapy?**

MST is an intensive, evidence-based intervention designed to address the complex factors contributing to behavioral barriers in youth aged 12-17. It operates within the youth's natural environments – home, school and community – to promote positive behavioral change and prevent out-of-home placements. Learn more on the [MST Services website](#) and the [Title IV-E Prevention Services website](#).



### **What is Functional Family Therapy?**

Functional Family Therapy (FFT) is an evidence-based, short-term family counseling intervention aimed at youth aged 11-18 who exhibit behavioral or emotional challenges. FFT is an intensive home-based treatment model. FFT follows a structured, five-phase model focusing on engagement, motivation, relational assessment, behavior change and generalization. Learn more on the [Functional Family Therapy website](#) and the [Title IV-E Prevention Services website](#).



### **Advisory Committees:**

All interested stakeholders are welcome to join the CO-SOC team for the Implementation Advisory Committee, the Statewide Leadership Committee, and the Lived Experience Committee. Please visit the [Intensive Behavioral Health Services for Medicaid \(IBHS\) website](#) for registration information. After

registering, you will receive a confirmation email containing information about joining the webinar.



### **Want to Know More?**

We encourage stakeholders, families and community partners to stay informed. [Sign up](#) for the CO-SOC for Children and Youth Behavioral Health newsletter, visit the [website](#) for meeting links, agendas, updates and resources, or email us at [hcpf\\_co\\_soc@state.co.us](mailto:hcpf_co_soc@state.co.us).

We look forward to working together to ensure that children and youth receive the care and support they need to thrive. Stay tuned for updates as we continue to roll out the Colorado System of Care.

### **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:**

- Serious Mental Illness (SMI) and Serious Emotional Disturbance (SED) Stakeholder Engagement Forum. Second and third month of the quarter on the third Thursday from 12 p.m. to 1 p.m. [Register](#) in advance.
- 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](mailto: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](mailto:hcpf_bhbenefits@state.co.us)

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