

HCPF/BHA/CDPHE Behavioral Health Secure Transportation Stakeholder Meeting

March 22, 2023
2:00pm

Agenda

- Welcome and Introductions
- Overview
- HCPF Rule Review
- HCPF Reimbursement Strategy
- BHA Reimbursement Option
- Next Steps and Timeline
- Q&A About Behavioral Health Secure Transportation



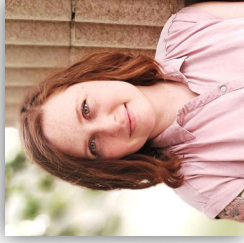
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Department of Health Care
Policy & Financing



Introductions



Meghan Morrissey
Behavioral Health
Secure Transportation
Policy Advisor
Colorado Department
of Health Care Policy
& Financing (HCPF)



Emily Holcomb
Mobile Crisis Policy
Advisor
Colorado
Department of
Health Care Policy
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John Lentz
Wraparound Services
Unit Supervisor
Colorado
Department of
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Megan Lee
Manager of Crisis
Services Colorado
Behavioral
Health
Administration
(BHA)



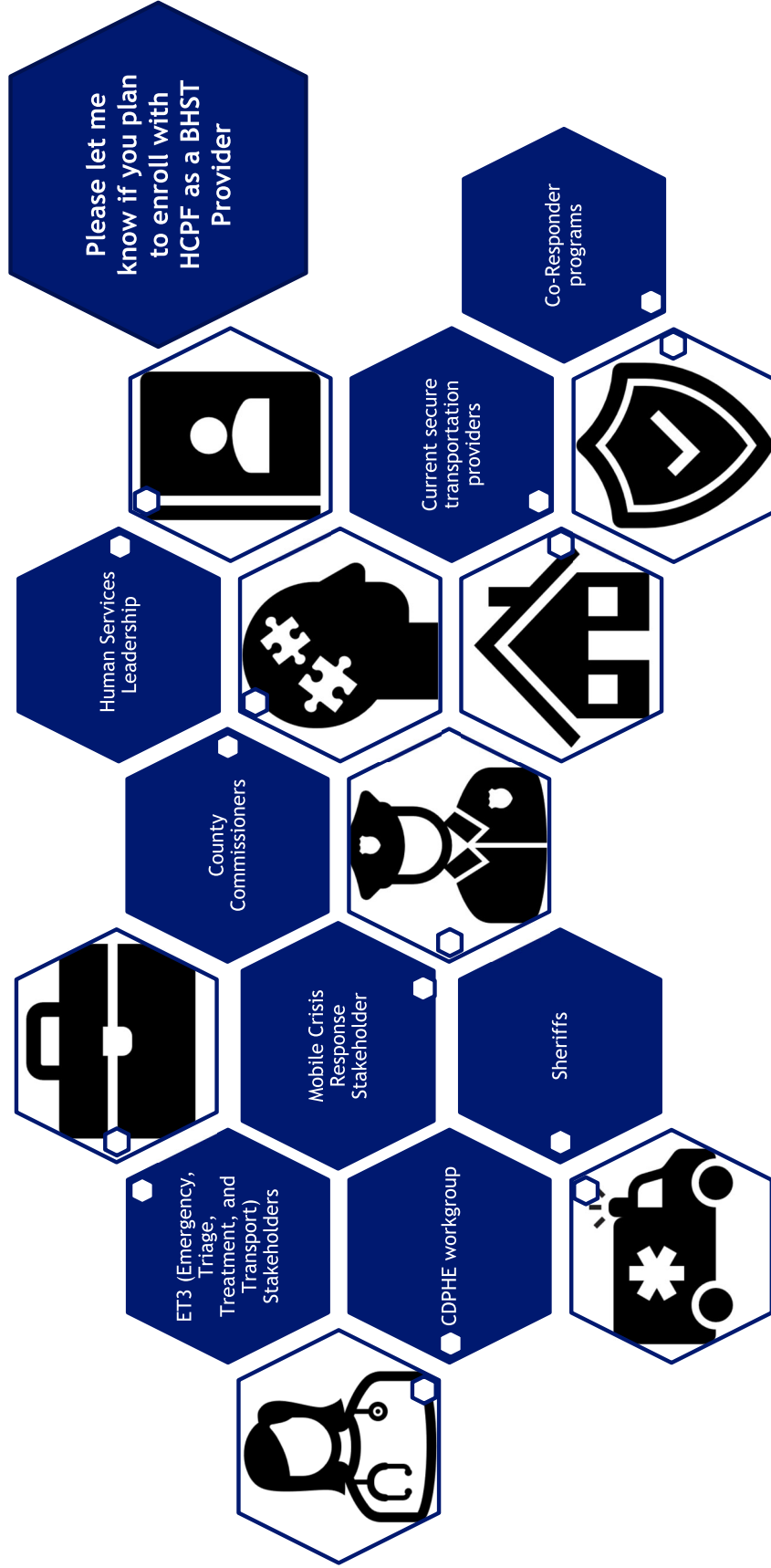
Mary Hoefler
Manager of Crisis
Services Colorado
Behavioral
Health
Administration
(BHA)



**Kara
Johnson-Hufford**
Interim Deputy
Division Director of
Health Facilities &
EMS Division (CDPHE)



Stakeholders



Behavioral Health Secure Transportation (BHST) Overview



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Behavioral Health Secure Transportation (BHST) Goals

- New alternative option for secure transportation throughout levels of behavioral health care
- Administratively simple
- Billed separately from other services, including Mobile Crisis Response (MCR)

BHST Basics

- HB 21-1085 mandates secure transportation for behavioral health crises with payments from Health Care Policy and Financing (HCPF) no later than July 1, 2023.
- HCPF is developing this new benefit for Medicaid members in alignment with mobile crisis response and transportation best practices.



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HCPF Rule Review

(Virtual) Public Rule Review Meeting (PRRM):
<https://hcpf.colorado.gov/medical-services-board>

Final Adoption Meeting: April 14, 2023

HCPF Rule Definitions

8.019 SECURE TRANSPORTATION

8.019.1 DEFINITIONS

8.019.1.A “Behavioral Health” means an individual’s mental and emotional well-being and actions that affect an individual’s overall wellness. Behavioral health issues and disorders include substance use disorders, serious psychological distress, suicide, and other mental health disorders, and range from unhealthy stress or subclinical conditions to diagnosable and treatable diseases. The term “behavioral health” is also used to describe service systems that encompass prevention and promotion of emotional health and prevention and treatment services for mental health and substance use disorders.

8.019.1.B “Behavioral Health Crisis” means a significant disruption in a person’s mental or emotional stability or functioning resulting in an urgent need for immediate assessment and treatment to prevent a further or serious deterioration in the person’s mental or physical health.

8.019.1.C “Secure Transportation” or “Secure Transportation Services” means urgent transportation services provided to individuals experiencing a Behavioral Health Crisis.

Eligibility

8.019.2 CLIENT ELIGIBILITY

- 8.019.2.A. A Colorado Medicaid client is eligible for Secure Transportation Services if the Client is in Behavioral Health Crisis pursuant to 6 C.C.R. 1011-4(2.5). *A Behavioral Health Crisis may be established by an intervening professional as defined in Section 27-65-105(1)(a)(II), C.R.S.; skilled professional as defined in 2 C.C.R. 502-1; independent professional person as defined in Section 27-65-102(11), C.R.S.; certified peace officer as defined in 4 C.C.R. 901-1, Rule 1(k), Section 21.400.1; or by an Emergency Medical Services (EMS) provider as defined in 6 C.C.R. 1015-3 Section 2.22.*

8.019.3 PROVIDER ELIGIBILITY

- 8.019.3.A. A Medicaid enrolled provider that is licensed and meets the requirements pursuant to 6 C.C.R.1011-4.
- ~~4. Medicaid-enrolled providers must adhere to the restraint requirements pursuant to 6-C.C.R.-1011-4(8.3).~~

Covered Services

8.019.4 COVERED SERVICES

8.019.4.A. Secure Transportation includes:

1. Transportation of an individual from the community to a facility for treatment and evaluation pursuant to Section 27-65-103 or 27-65-105(1), C.R.S. and Article 65 of Title 27;
2. Transportation of an individual from any location to an approved treatment facility or to a walk-in crisis center that is in operation as part of the behavioral health crisis response system as described in Articles 81 and 82 of Title 27; Section 27-81-106, C.R.S.; or
3. An individual who is receiving transportation across levels of care or to a higher or lower level of care, transportation between any of the following types of facilities:
 - a. An emergency medical services facility;
 - b. A facility designated by the Executive Director of DHS for the treatment and evaluation pursuant to Article 65 of Title 27;
 - c. An approved treatment facility, as described in Section 27-81-106, C.R.S.;
 - d. A walk-in crisis center that is operating as part of the behavioral health crisis response system; or
 - e. A behavioral health entity (BHE) licensed with a current twenty-four (24) hour endorsement pursuant to Section 25-27.6-106, C.R.S.

Non-Covered Services

8.019.5 NON-COVERED SERVICES

- 8.019.5.A. Secure Transportation does not include transportation services provided by on-duty law enforcement.
1. Except that any member of a co-responder team may provide Secure Transportation services if that co-responder:
 - a. Is not on-duty law enforcement; and
 - b. Holds a valid license for Secure Transportation by the county in which the Secure Transportation originates; and
 - c. Provides Secure Transportation in a vehicle:
 - i. With a valid permit issued by the county in which the Secure Transportation originates; and
 - ii. That meets the minimum requirements for Secure Transportation services 6 CCR 1011-4(3.1).

Prior Authorization Not Required

8.019.6 PRIOR AUTHORIZATION REQUIREMENTS

8.019.6.A. Prior authorization is not required.

Behavioral Health Secure Transportation (BHST) Reimbursement

Medicaid Transportation Spectrum

Scheduled

Unscheduled

Non-Medical Transport

Non-Emergent Medical Transport

Behavioral Health Secure Transport

Emergency Transport

Scheduled trips to non-medical places that support member health and community integration

*eligible to Medicaid waiver members only

Scheduled trips to provide continuity of care to members, including planned outpatient or inpatient appointments

Urgent transportation to members in behavioral health crisis
*language is subject to change

Urgent and emergent transportation due to medical emergency to highest level of care

Medicaid Reimbursement

Behavioral Health Secure
Transport

Urgent transportation to
members in behavioral
health crisis

*language is subject to
change

- Will align with current transportation [mileage rates](#)
- No payment differential based on licensure nor vehicle type
- Preliminary rates (subject to change)
 - A0999 = \$262.66
 - A0425 = \$6.10 per mile



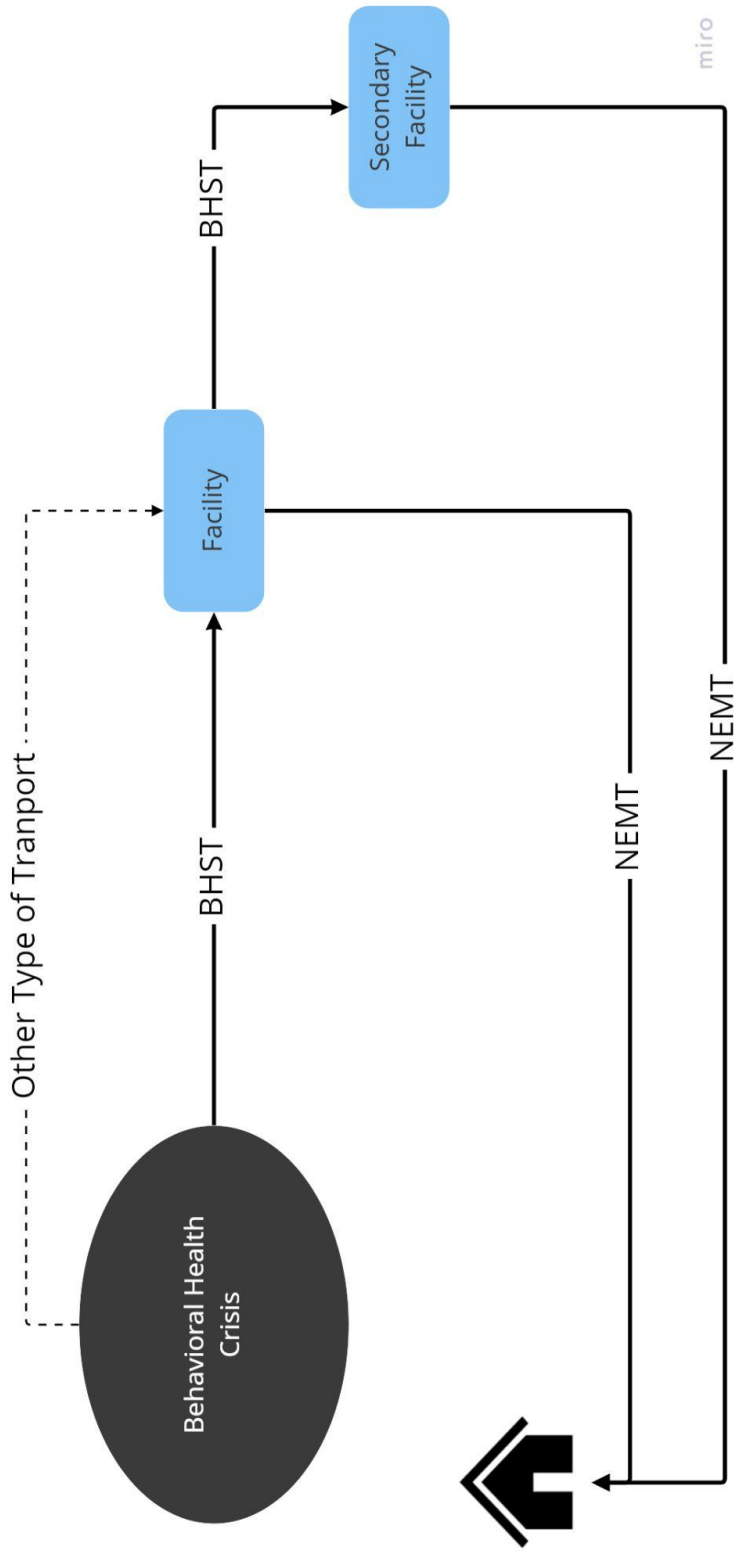
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BHA Reimbursement Option

General Accounting Encumbrance (GAE)

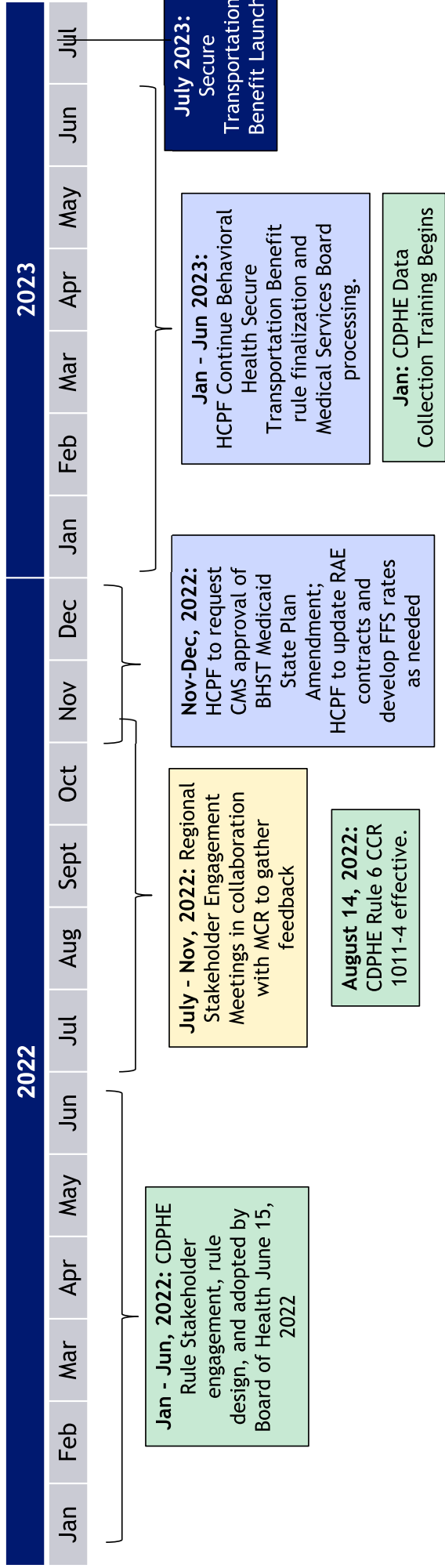
- Available to Administrative Service Organizations (ASO) and Community Mental Health Centers (CMHC) only
- contact mary.hoefler@state.co.us for more information

BHST in Practice



BHST Implementation Timeline

All dates are subject to change.



HCPF has been mandated to pay for Secure Transportation Services by July 1, 2023 and looks forward to collaborating with all system partners in the finalization of the initial benefit and continually improving based on the needs of Medicaid Members and Coloradans across the state.



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HCPF Medical Service Board

- First MSB reading was March 10, 2023
- Second reading will be April 14, 2023

Payment for services rendered on or after July 1, 2023 will be available for reimbursement to enrolled providers.

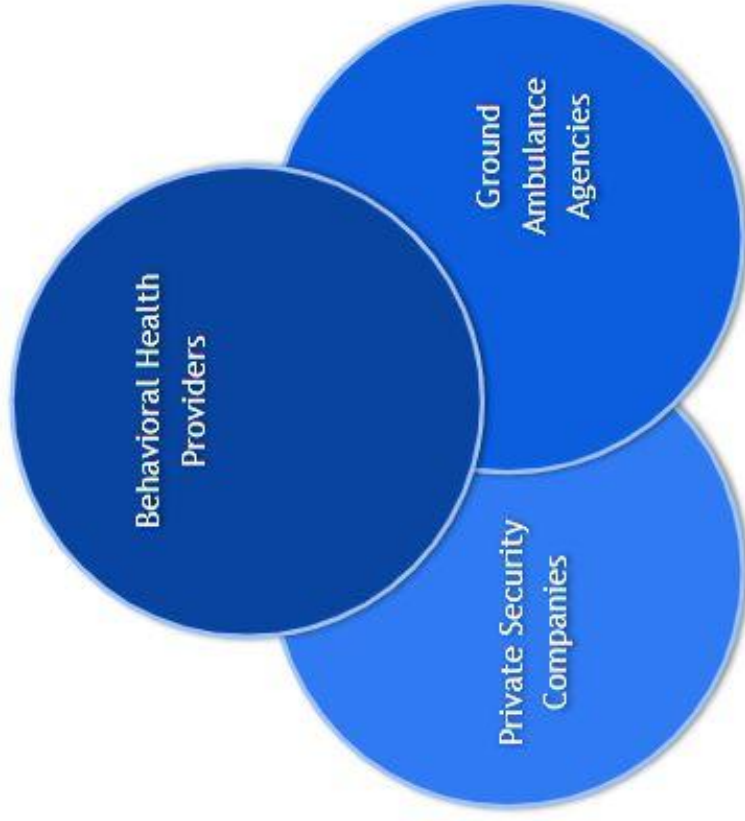
Current Responsibilities

CDPHE	Data Collection
HCPF	Stakeholder rule and reimbursement strategy
BHA	Reimbursement strategy and best practices
Counties	License BHST providers and permit BHST vehicles
BHST Providers	Obtain BHST licenses and permits from each county of planned operation Optional: Enroll as NEMT provider if interested in providing return trip

BHST Workforce

red highlights indicate training requirements that distinguish BHST staff from layperson and are not general administrative policy training

Workforce



BHST Staff

“Direct client contact” means any staff member who interacts directly with clients either before, during, or after the secure transportation service and is qualified by training pursuant to Part 7.7(A)(1). This may include the **driver** or any other staff member who is not providing direct client support.

“Direct client support” means any staff member who interacts directly with clients and is qualified by training pursuant to Part 7.7(A)(2) in mental health first aid, basic first aid, and cardiopulmonary resuscitation (CPR) who is assigned to provide secure transportation services to individuals experiencing a behavioral health crisis.

BHST Driver

- current and valid driver's license
- current and valid certification for all training topics listed in **Part 7.7(A)(1)**
 - **Cultural competencies** including, but not limited to, supporting persons with physical or cognitive disabilities, language accessibility, and accessing interpretive services;
 - In-person or online verbal **de-escalation training** sessions that prioritize client and staff safety and inform restraint requirements set forth in Part 8.3;
 - **Trauma-informed care** principles;
 - **Evade and escape violent encounter strategies**;
 - Internal policies and procedures applicable to the secure transportation service and staff, including, but not limited to the staff disciplinary policy;
 - Client rights; and
 - Compliance with applicable privacy laws, including, but not limited to
 - Confidentiality of Substance Use Disorder Patient Records set forth at 42 CFR Part 2 for the support of clients with substance use disorders.

BHST Support Staff

“Direct client support” means any staff member who interacts directly with clients and is qualified by training pursuant to **Part 7.7(A)(2)** in mental health first aid, basic first aid, and cardiopulmonary resuscitation (CPR) who is assigned to provide secure transportation services to individuals experiencing a behavioral health crisis.

Must have Minimum Training PLUS:

- **Adult and Youth Mental Health First Aid** as offered by educational institutions or by professional organizations such as mentalhealthfirstaid.org, or the equivalent;
- **Basic First Aid and CPR**; and
- Care of clients with **substance use disorders**.

BHST Restraint Staff

- Circumstances and protocols governing the permissible application of individual physical restraint during secure transport in accordance with Part 8 of these rules; and
- Safe application of individual physical restraint on clients during secure transport.

Timelines

- Annual training required
- Records of training requirements must be available to counties

Policies for BHST Staff Scope

- Appropriate procedures to **assess initially** whether the client requires a higher **level of transport** than the service can provide;
- Appropriate procedures to follow when, during a secure transport, it becomes apparent that a client needs medical attention or a higher level of transport than the service can provide;
- Appropriate procedures to confirm the receiving facility's acceptance of the client prior to initiation of the secure transport;
- Criteria used for pickup and drop-off, including the circumstances that determine a secure transport client's eligibility as set forth in Part 8.1;
- The **level of support and protection** needed for both client and staff safety;
- Compliance with vehicle safety standards and procedures set forth in Part 3.3(A)(10);
- Proper evacuation of the vehicle during emergencies if the windows and/or exits of the vehicle are blocked or inaccessible;
- **Infection prevention and control**, including the decontamination of the vehicle after each transport;
- **Parental and/or guardian level of support** and involvement;
- Meeting client needs on extended transports including meals, water, and bathroom breaks;
- Documentation of all steps in the process from initial pickup request to drop-off, including but not limited to documenting all stops made during the secure transportation service.
- In addition, the county shall ensure that all Class A secure transportation services have the following policies and procedures that address, at a minimum:
 - The **circumstances under which staff who provide direct client support may apply individual physical restraint** during the course of the secure transportation service, given the parameters outlined in Part 8.3, and
 - The application of individual physical restraint, including training protocols and safety precautions, to **ensure the restraints do not restrict the client's airway or breathing ability**.
-

NEMT Provider Enrollment

- [Non-Emergent Medical Transportation](#)
 - Provider differences
 - BHST requires providers have CPR and First Aid
 - NEMT requires providers have BLS
- [HCPF Provider Enrollment](#)
 - Allow up to one month for processing

HCPF BHST FAQ

QUESTION: How can I enroll as a HCPF BHST Provider?

ANSWER: Secure Transportation will be a specialty type under the new Behavioral Health Crisis Services Provider Type. As this provider type becomes available, an email will be sent inviting BHST providers to follow the [Medicaid Enrollment Process](#). To learn more about this process, please review [provider resources](#). Providers enrolling as a BHST provider will be required to submit licenses and permits from each county in which they operate.

Provider Type # - Behavioral Health Crisis Services

Specialty: Secure Transportation

Specialty Code: #

Enrollment Type: Atypical

BHST Provider Enrollment

QUESTION: If I am already enrolled with HCPF to provide any type of Behavioral Health care, do I need to enroll separately to provide BHST?

ANSWER: Yes, if you are already enrolled with HCPF to provide Behavioral Health care, you will need to assure specific enrollment as a Behavioral Health Crisis Services Provider with the specialty type of Secure Transportation in order to get reimbursement through HCPF for BHST services.

Provider Type # - Behavioral Health Crisis Services

Specialty: Secure Transportation

Specialty Code: #

Enrollment Type: Atypical

EMT Providers & BHST

QUESTION: If I am already enrolled with HCPF to provide Emergency Medical Transportation, do I need to enroll separately to provide BHST?

If you are an enrolled HCPF Emergency Medical Transportation Provider Type 13 (Specialty Type 124 or 324), you do not need to enroll as a Behavioral Health Crisis Services Provider with the specialty type of Secure Transportation in order to bill BHST codes. As a HCPF Enrolled Provider Type 13 (Specialty 124 or 324), the provider must maintain appropriate records demonstrating compliance with the secure transportation minimum standards, including the “secure transportation vehicle safety and design standards” per [CDPHE Rule 6 CCR 1011-4](#). CDPHE Rule also indicates that “A ground ambulance agency shall notify CDPHE if it is providing secure transportation services under its ground ambulance license as part of its secure transportation service profile set forth at Part 6.4.”

Please see [CDPHE FAQ](#) for more detail on Ground Ambulances who provide BHST services.

Additional FAQs

QUESTION: How can I find out who is doing BHST in my area?

ANSWER: Since counties regulate BHST providers via licensure and permitting, please outreach counties directly to see who is licensed in your jurisdiction to provide BHST.

County Contacts Needed

Adams	Dolores	Las Anima	Park
Alamosa	Elbert	Lincoln	Phillips
Baca	Fremont	Logan	Pitkin
Bent	Gilpin	Mineral	Rio Blanco
Chaffee	Gunnison	Moffat	Rio Grande
Cheyenne	Huerfano	Montezuma	Routt
Clear Creek	Jackson	Montrose	Saguache
Costilla	Kiowa	Morgan	San Juan
Crowley	Kit Carson	Otero	Sedgwick
Custer	La Plata	Ouray	Washington
			Weld

Resources

- [House Bill 21-1085](#)
- [CDPHE Rule 6 CCR 1011-4](#)
- [HCPF Website:](#)
<https://hcpf.colorado.gov/securetransport>
- [Colorado Counties, Inc](#)
- Newsletter

Next Steps

- HCPF/CDPHE/BHA Stakeholder Meeting
 - April 20, 2023 10am-11am**
 - Topic: TBD
 - Register Here: <https://us06web.zoom.us/webinar/register/WN-TEVLJzXRIOcB3cHw11plg>

Please fill out our engagement survey here:
<https://forms.gle/WdHpUYiqsYqp74GE8>

Thank You and Questions

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