

# CCBHC Prospective Payment System Subcommittee

August 2025



**COLORADO**  
Department of Health Care  
Policy & Financing



**COLORADO**  
Behavioral Health  
Administration

# Agenda

- Scope of Services
- Triggering Events
- Allowable Costs
- Reconciliation and Rebase Timeline

# Planning Grant Roadmap

12-month Process	Planning for CCBHC Implementation (January 2025 – December 2025)											
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Steering committee(s)	Develop committee(s)		Maintain committees, subcommittees, and partnerships (e.g., state clinics, associations) with regular meeting cadences, notes, and deliverables to ensure stakeholder and community engagement in the CCBHC demo									
Populations & service areas	Solicit input from focus populations, identify potential CCBHCs & their service areas					Identify population health needs and secure insight from those communities, work with providers to select initial sites and regions they will serve as CCBHCs						
CCBHC training & education	Identify and provide TA needs for providers (e.g., CCBHC-PPS, billing, quality measures) as possible											
Infrastructure for data quality	Identify data collection infrastructure needs and begin processes for quality measurement					Onboard and maintain technology platforms for clinic and state efforts to ensure accurate measurement of quality measures and population health needs						
Assess clinic & community needs	Launch and complete community needs assessments and clinic readiness assessments					Assure clinics' community needs assessments and clinic readiness assessments are complete, accurate, and aligned for criteria and certification needs						
Scope of Services & Certification	Finalize Scope of Services and activities that will be included in certification & PPS rate				Formalize CCBHC criteria & Create certification process			Work with clinics to meet SAMHSA and state certification criteria, certify clinics, and plan for future certifications				
Establish CCBHC-PPS					Select CCBHC PPS		Establish a CCBHC-PPS system and work with clinics to help calculate a clinic-specific rate			Establish payment operations & review cost reports		
MS Approval for CCBHC												Prepare to apply for the Demonstration in 2026

# Introductions

Thank you for your time today!

Share your name and who you represent in the chat!

# CSNP v CCBHC

## Scope of Service

### CSNP

- Emergency and crisis behavioral health services
- Mental health and substance use outpatient services
- Behavioral health high-intensity outpatient services
- Care management
- Outreach, education, and engagement services
- Mental health and substance use recovery supports
- Outpatient competency restoration
- Screening, assessment, and diagnosis, including risk assessment, crisis planning, and monitoring to key health indicators

### CCBHC

- Crisis Services
- Outpatient Mental Health and Substance Use Services
- Psychiatric Rehabilitation Services
- Targeted Care Management
- Person- and Family- Centered Treatment Planning
- Community-Based Mental Health Care for Veterans
- Peer Family Support and Counselor Services
- Outpatient Primary Care Screening and Monitoring
- Screening Diagnosis, and Risk Assessment

# Triggering Events - Update

**Question:** What are triggering events?

**Answer:** Triggering events are services that produce a PPS payment for a given patient and date of service.

Based on scope of service decisions, a corresponding change to the triggering event list is needed.

- Triggering events for CCBHC will match the CSNP triggering event list.
- Administration of MAT will NOT be a triggering event for the CCBHC PPS.



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# Allowable Costs - Update

**Question:** What are allowable costs?

**Answer:** Costs that can be reported on the cost report used to set the PPS rates.

- Prior year costs directly impact future year rates
- Option in CCBHC cost reporting to prospectively include some reasonable and prudent costs, but state has limited flexibility to do so outside of budget process and due to state fiscal constraints
  - The State anticipates prioritizing demonstration participants (minimum of 2) based on ability to participate with the least resource lift.

# Reconciliation vs. Rebasing

- **Reconciliation retrospectively** compensates providers for differences between actual costs and service revenue.
- **Rebasing** updates PPS rates **prospectively** based on the most recently available data (prior year's cost report) rather than just trending forward by an inflation factor such as Medicare Economic Index (MEI).
- HCPF included a reconciliation process when first implementing PPS rates in Colorado to mitigate high levels of financial risk stemming from uncertainty.
- For CCBHC, the state would **rebase annually**, but not use a reconciliation process.



# Planning Grant to Demonstration

**November 2025**

- Auditable cost report due
  - For July 2026-June 2027 rate

**April 2026**

- Provisionally onboard at least 2 centers for Phase 1

**July 2026**

- Demonstration begins

**November 2026**

- Auditable cost report due
  - Rebase rates for July 2027-June 2028



# Action Needed

Shall the PPS Subcommittee to join the Certification Subcommittee in their recommendation of the proposed Scope of Services.

# Next Steps

Exit Survey: See chat for the link to today's exit survey.

Next meeting: September 17 @ 2:00pm

Future topics: Provider Technical Assistance

# Resources

HCPF Behavioral Health Benefits Inbox:  
[hcpf\\_bhbenefits@state.co.us](mailto:hcpf_bhbenefits@state.co.us)

HCPF Websites:  
[Behavioral Health \(calendar of stakeholder  
engagements\)](#)  
[CCBHC](#)  
[Newsletters](#)