



Feeling Like You Have One Foot In Two Worlds?

Let's Get Grounded on the Transition to the Behavioral Health Entity License and Safety Net Approvals!



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Agenda

- Why the state is reforming behavioral health licensure
- History of the BH reform leading to expansion of the safety net
- New licensure and approval types
- Mapping existing licensure to new BHE license, safety net approvals, and endorsements
- Timeline of reform efforts
- How providers can prepare for changes

What You Will Learn Today

- Participants will be able to summarize several reasons why the state is moving to new safety net rules, licensure, and safety net approvals and the intended benefits to the behavioral health system.
- Participants will be able to determine how their organization fits with licensure and approval changes.
- Participants will be able to explain the different levels of licensure and approvals, frequently used acronyms, and general rule requirements and map their current services to the new licensure and approval opportunities.
- Participants will be able to identify the timelines for implementing any licensure and approval changes and apply the timeline to their organization's specific circumstances.
- Participants will be able to apply the steps that are needed for their organization to move towards a new license or approval.



Acronym Key

ATU	Acute Treatment Unit
BHA	Behavioral Health Administration
BHASO	Behavioral Health Administration Service Organization
BHE	Behavioral Health Entity
CDPHE	Colorado Department of Public Health and Environment
CMHC	Community Mental Health Clinic
CSU	Crisis Stabilization Unit
DORA	Department of Regulatory Agencies
HIOP	High Intensity Outpatient Services
IDD	Intellectual and Developmental Disabilities
LADDERS	Licensing and Designation Database and Electronic Records System
LOI	Letter of Intent
OTP	Opioid Treatment Program
PT	Provide Type
OBH	Office of Behavioral Health
OP	Outpatient Services
SUD	Substance Use Disorder
TBI	Traumatic Brain Injury
WM	Withdrawal Management



Why is Colorado Reforming Behavioral Health Licensure and Approvals

An Introduction to the History of BH Reform Leading to the Expansion of the Safety Net

Goals in Changes to Licensure and Approvals

Colorado is in the process of significant behavioral health reform including policy and system design as well as licensure for providers with the ultimate goals of **expanding access to care and enhancing the quality of care** delivered to all people in Colorado.

As part of this transformation there are two important goals in changing provider licensure:

1

Streamline behavioral health licensure by combining the mental health designation and the substance use disorder licensure process into a single Behavioral Health Entity (BHE) License.

2

Elevate and enhance care for the safety net through expanded expectations for providers to deliver a continuum of services and be accountable to all populations through the creation of new safety net approvals. Includes changes in payment aligned with safety net approval to support provider capacity and long-term sustainability.



Many of the reforms stem from the "Comprehensive Plan to Strengthen and Expand the BH Safety Net System" [SB-19-222](#).



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Specific Goals in Expansion of Safety Net Providers



Expand the number of providers eligible for and delivering comprehensive services



Create new pathways for providers to become part of the safety net, even for specialized providers



Elevate quality standards for the safety net services

- Improve access, quality, and accountability of care for priority populations
- Enhance care coordination



Improve sustainability of safety net providers and long-term innovation in the state



To learn more about the BHA transformation see [2023-2025 BHA Strategic Plan](#)





Who Should Be Following the
Transition in BHE Licensure and
Safety Net Provider Approvals?

Provider Organizations Who May Be Impacted by the Changes



Providers who currently hold or have held a SUD license by the BHA or by OBH



Providers who hold a BHE license issued by CDPHE



Providers who currently hold or have held an OBH or BHA designation as a community mental health center or community mental health clinic



Providers who would have been previously required to obtain a SUD license, CMHC, or CMHC designation based on services provided or as a requirement for a payer prior to January 1, 2024

Provider Organizations Who May Be Impacted by the Changes (pt. 2)



Providers who hold a controlled substance license to utilize stock medications in the treatment of SUD



Providers with 10 or more Full Time Equivalent (FTE) licensed or certified behavioral health professionals, including Contractors



Providers of education and/or treatment services to criminal justice-involved individuals, including SUD education and treatment and/or DUI/DWAI services



Providers of overnight/residential behavioral health services that do not have a facility license that includes those services



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Provider Organizations Who May Be Impacted by the Changes (pt. 3)



Providers who want to add a new service



Providers who do not currently hold a license with the BHA, OBH or CDPHE and are interested in exploring safety net provider options



Providers who are considering adding or removing a service line and would like to understand options related to licensure and designation requirements



Provider Organizations Who *May* NOT be Impacted by the BHE license transition

These providers may need to be dually licensed, depending on what services are provided



Residential Child Care Facility

- RCCF is not required to have a BHE UNLESS the RCCF offers substance use or crisis stabilization unit services



General or Psychiatric Hospital

- Hospitals are not required to have a BHE UNLESS they have a Controlled Substance License



Assisted Living Residence

- Assisted Living Residences do not require a BHE UNLESS they are a Mental Health Transitional Living Home



Provider Organizations Who Will Not be Impacted by the BHE license transition



Nursing Homes




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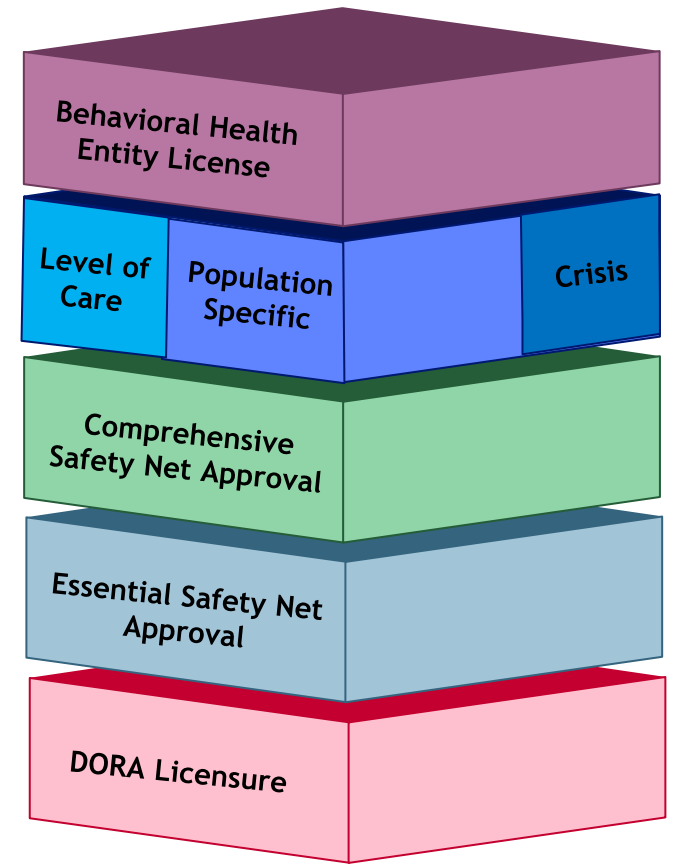


What Are the Changes Being Made?

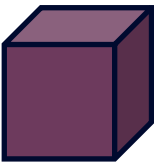
Introduction to the BHE License and the Comprehensive and Essential Safety Net Provider Approvals

The Building Blocks of Licensure and Safety Net Approvals

Behavioral Health Entity License	01
BHE Service Endorsements <ul style="list-style-type: none">• Level of Care Endorsements• Population Specific Endorsements• Crisis Endorsements	02
Comprehensive Safety Net Approval	03
Essential Safety Net Approval	04
Department of Regulatory Agencies (DORA) Licensure	05



An Introduction to the Behavioral Health Entity License



The BHE license model provides a “cafeteria-style” license in which an agency holds a single BHE license with different endorsements, allowing the agency to offer various services at multiple locations.

- This new model increases flexibility for providers, so that they may tailor their license to the services they provide. Ultimately, this adaptability allows for easier addition of services and locations in order to meet the needs of the populations served.
- The model streamlines licensure and allows a single license for organizations offering both mental health and substance use services.



Behavioral Health Entity (BHE) Licensing legislation <https://leg.colorado.gov/bills/hb19-1237>



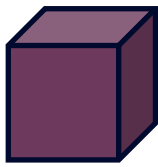
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Exercise #1 Is My Agency a Behavioral Health Entity?



I need to transition to the new Behavioral Health Entity licensure if I am a behavioral health agency that:

Provides education and/or treatment services to criminal justice-involved individuals, including SUD education and treatment and/or DUI/DWAI services. **True or False?**

Provides overnight/residential behavioral health services and does not have a facility license that includes those services. **True or False?**

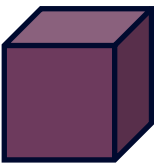
Is a psychiatric hospital without a controlled substance license. **True or False?**

Has ten (10) or more Full Time Equivalent (FTE) licensed or certified behavioral health professionals, including contractors. **True or False?**

Currently holds a BHE license issued by the CDPHE. **True or False?**



Is My Agency a Behavioral Health Entity? (continued)



True

If I am an agency that provides education and/or treatment services to criminal justice-involved individuals, including SUD education and treatment and/or DUI/DWAI services, I need to transition to the BHE.



True

If I am an agency that provides overnight/residential behavioral health services and does not have a facility license that includes those services, I need to transition to the BHE



False

If my organization is a psychiatric hospital without a controlled substance license, I DO NOT need to get a BHE license



True

If my agency has ten (10) or more Full Time Equivalent (FTE) licensed or certified behavioral health professionals, including contractors, I need to transition to the BHE

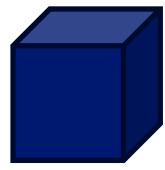


True

If my agency currently holds a BHE license issued by the CDPHE, I need to transition to the new BHE.

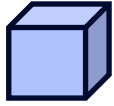
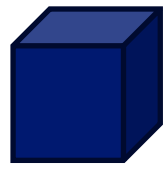


Behavioral Health Entity (BHE) Service Endorsements



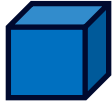
- ✓ Obtaining an endorsement means an agency is approved, licensed, or designated by BHA to provide a specific service.
- ✓ A Behavioral Health Entity (BHE) may only provide services for which it holds an endorsement as part of its license, and at locations authorized by its license.
- ✓ Endorsements include treatment types in which the agency provides such as for mental health disorders, substance use disorders or both (co-occurring disorders)
- ✓ If a BHE has not provided BH services specific to its endorsement for one (1) year, the BHA will review the endorsement and may remove it from the BHE's license.

3 Types of Endorsements



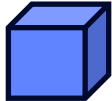
1. Level of Care Endorsements

- Recovery Supports
- Outpatient and High Intensity Outpatient Services
- Residential and Overnight Services



2. Crisis Endorsements

- Walk-in Services
- Mobile Crisis
- 24-Hour/Acute Treatment Services
- 24-Hour/Crisis Stabilization Services
- Residential Respite



3. Population Specific Endorsements

- Emergency and Involuntary Commitment (EC/IC)
- Children and Families
- Women's and Maternal BH Treatment
- Criminal Justice Involved Services

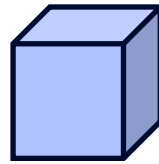


BHE Endorsement
Structure:

https://drive.google.com/file/d/1_vHwmHGvoKgcZ60kDhvi7vmtuMuEjFXr/view



Level of Care Endorsements-Defined



Recovery Supports: provided by Peer Support Professionals to support healing, personal growth, life skill management, self-care and crisis strategy development.

Outpatient Services: intended for individuals who are assessed as not appropriate for more intensive levels of care. Outpatient services may also be a step-down from a higher level of care or offered when an individual is in early stages of change and declines participation in the higher level of care indicated by the assessment.

High-Intensity Outpatient Services: intended for individuals who require a higher level of intervention than can be provided in standard outpatient services.

Residential and Overnight Services: intended for individuals who may benefit from twenty-four (24) hour structure and supportive services to develop, practice and integrate coping skills in preparation for reintegration into their community of choice.



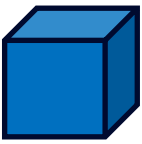
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Crisis Endorsements-Defined



Walk-In Services Endorsement:

- This endorsement allows agencies to offer **walk-in services** for immediate assistance.
- It's useful for crisis intervention, assessments, and urgent mental health needs.

24-Hour/Acute Treatment Services Endorsement:

- Agencies with this endorsement can operate **24-hour/overnight acute treatment programs**.
- These programs provide intensive care for individuals experiencing severe mental health crises. Must also meet Walk-in criteria.

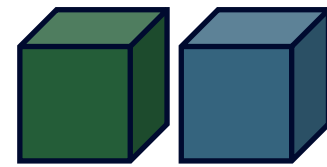
24-Hour/Crisis Stabilization Services Endorsement:

- This endorsement enables agencies to run **24-hour/overnight crisis stabilization units**.
- These units offer short-term stabilization and support during mental health crises. Must also meet Walk-in criteria

Remember that these endorsements allow agencies to tailor their services to meet specific community needs. They play a crucial role in ensuring accessible and comprehensive behavioral health care for individuals in Colorado.



Let's Transition From BHE Licensure to Safety Net Approval

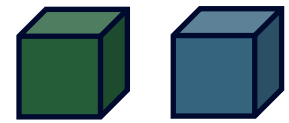


What does it mean to be part of the safety net?

- Provider participation in the Behavioral Health Safety Net system is voluntary.
- Safety Net approval through BHA demonstrates that a provider is in compliance with the established safety net standards.
- Safety Net approval is NOT a license.
- There are 2 types of Safety Net Providers:
 - Essential
 - Comprehensive
- All Essential and Comprehensive Providers will still need to hold any/all professional or facility licenses required pursuant to federal and state law/regulations.
- Once approved, providers will be eligible to seek alternative payments for services they provide through state funding with BHA and HCPF



What Makes a Safety Net Provider Special?



Safety Net Providers serve priority populations and comply with the safety net “no refusal” requirements, care coordination, and ensure access to care to achieve whole person health



BHA Provider Rules

<https://www.sos.state.co.us/CCR/DisplayRule.do?action=ruleinfo&ruleId=2157&deptID=9&agencyID=70&deptName=Department%20of%20Human%20Services&agencyName=Behavioral%20Health&seriesNum=2%20OCCR%20502-1>

Fact Sheet on Safety Net Approvals

<https://drive.google.com/file/d/1NqOBy8J-wUARCxogVIPg5mc8dKcYNUjl/view>



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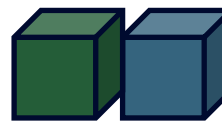


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No Refusal Requirements



The following are conditions under which a behavioral health safety net provider cannot refuse treatment to an individual, as indicated in 27-50-301(4), C.R.S:

Insurance coverage, lack of insurance coverage, or ability to pay

Clinical acuity

Readiness to transition out of an inpatient setting

Involvement in the criminal or juvenile justice system

Current involvement in the child welfare system

Co-occurring disorders or disabilities

Displays of or history of aggressive behavior

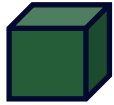
Clinical presentation or behavioral presentation in any previous interaction with a provider

Place of residence

Disability, age, race, creed, color, sex, sexual orientation, gender identity, gender expression, marital status, national origin, ancestry, or tribal affiliation



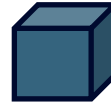
Safety Net Approval Types



Comprehensive Provider

Required to have 27-65 Designation in order to take OP certifications. Must provide or contract each of these services:

1. Emergency and Crisis BH
2. MH and SUD Outpatient
3. BH IOP
4. Care Management
5. Outreach, Education and Engagement
6. Recovery Supports
7. Outpatient Competency



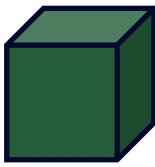
Essential Provider

Must provide at least one of these:

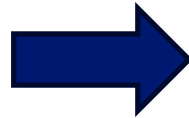
1. Emergency and/or Crisis BH
2. BH Outpatient
3. BH IOP
4. BH Residential
5. Withdrawal Management
6. BH Inpatient
7. Integrated Care
8. Hospital Alternatives



What is a Comprehensive Safety Net Provider?



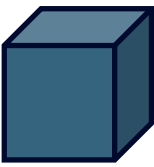
A BHA licensed BHE is required to have 27-65 Designation in order to take outpatient certifications, provide care coordination and all of the following services either directly or by subcontracting with another entity to provide the service:



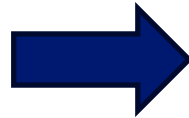
- Emergency and crisis BH services
- Mental Health and SUD OP services
- Behavioral Health HIOP services
- Care Management
- Outreach, education and engagement
- Mental Health and SUD recovery supports
- OP competency restoration
- Screening, assessment and diagnosis, including risk assessment, crisis planning and monitoring key health indicators



What is an Essential Safety Net Provider?



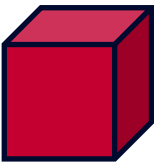
A BHA licensed BHE approved to provide care coordination and **at least one** of the following services either directly or indirectly:



- Emergency or crisis BH services
- BH outpatient services
- BH HIOP services
- BH residential services
- Withdrawal Management services
- BH Inpatient services
- Integrated care services
- Hospital alternatives
- Additional services that the BHA determines are necessary in a region or throughout the state



How Does DORA Licensure Relate to BHA Licensure and Approval?



The Department of Regulatory Agencies (DORA) licenses individual professionals across various professions

BHA licenses certain organizations delivering behavioral health services as required by statute or who chose to seek a BHA license or designation.

BHA licensure does not take the place of any/all required federal, state or other license requirements of your profession.



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Recovery Support Service Organization Licensure

Recovery Support Services Organizations may provide a variety of nonclinical, recovery-focused services and supports. These services shall include engaging individuals in peer-to-peer relationships that support healing, personal growth, life skills development, self-care, and crisis-strategy development to help achieve recovery, wellness, and life goals. These services may include, but are not limited to:

1. Peer-run drop in centers
2. Recovery and wellness centers
3. Employment services
4. Prevention and early intervention activities
5. Peer mentoring for children and adolescents
6. Warm lines
7. Advocacy services



Applications for initial licenses for RSSOs shall be submitted and processed according to procedures outlined in [2 CCR Section 21.120.22](#). Each approved RSSO that provides peer support and seeks reimbursement through Medicaid shall obtain a BHA-issued RSSO license annually.

The application fee for an RSSO license is \$200.



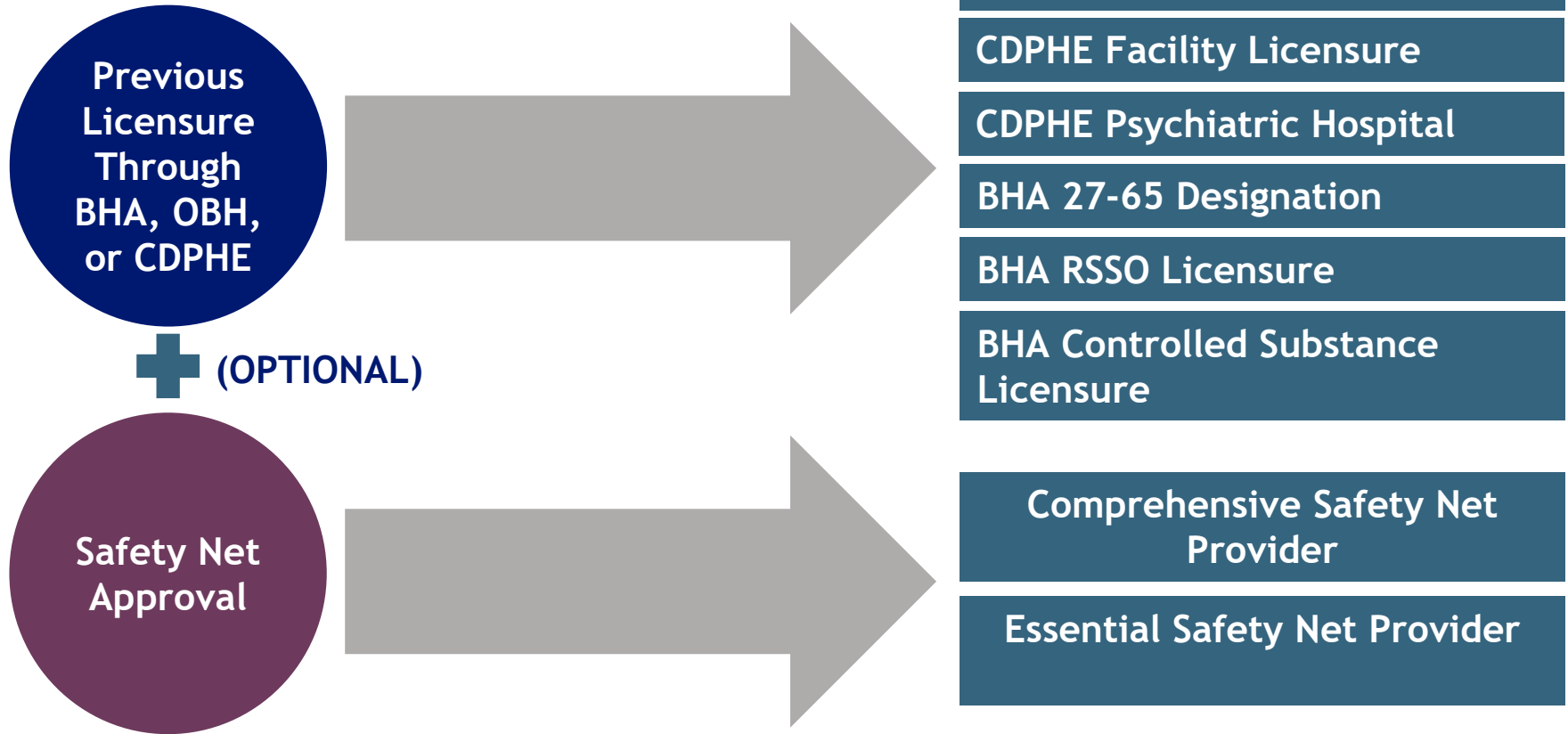
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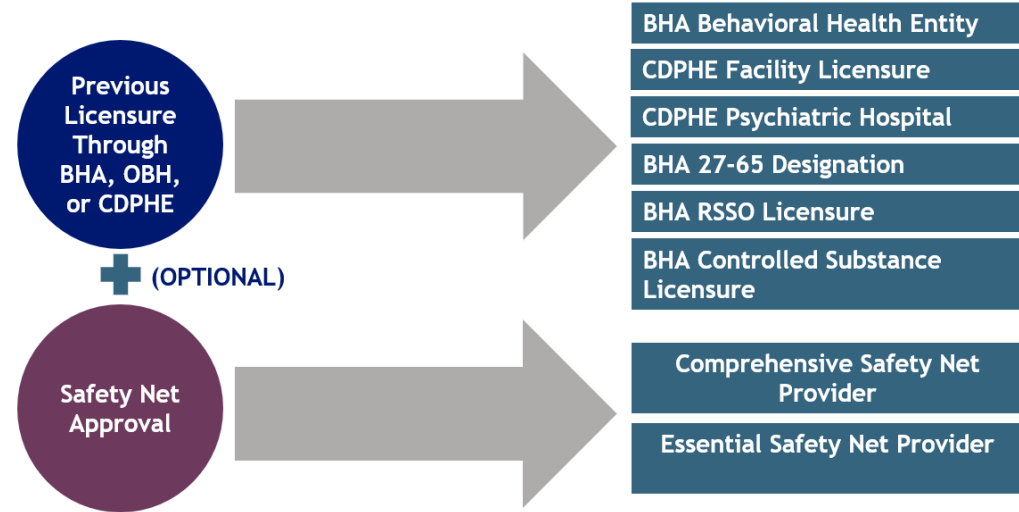


Where Licensing is Going



Timeline for BHE Licensure and Safety Net Approval

You are encouraged to apply for both BHE licensure and safety net approval **at the same time** for a more streamlined application and review process. If that is not possible, you are welcome to apply for one before the other. There is no deadline for safety net approval applications (outside of current CMHCs), and they do not have an associated fee.





Connecting BHA Safety Net Approval with HCPF Enrollment

Community Mental Health Center Enrollment



CMHC enrollment with HCPF will be discontinued at the end of December 2024



As the CMHC provider type is end-dated, these providers must enroll as new provider types (Comprehensive, Essential, BH Group, etc.)



Providers should not disenroll their current/old provider type. Current enrollments should not be end-dated until all claims have been paid for dates of service prior to June 30, 2024.



Comprehensive Safety Net Providers will be billing providers and will not be able to bill as the rendering provider (as current CMHCs are allowed).



Comprehensive Safety Net Provider Enrollment

Comprehensive providers must enroll as Provider Type (PT 78) - Comprehensive Safety Net Provider

- Comprehensive Safety Net providers will enroll as a single provider type that covers all services required of comprehensive providers.
- Comprehensive Safety Net providers will NOT need to also enroll as a SUD provider (PT 64) since outpatient SUD services are required of Comprehensive providers.
- May need to enroll as separate provider types separately if providing other services - SUD Residential, crisis stabilization unit, acute treatment unit, Opioid Treatment Provider, etc.
- A provider may enroll as both a Comprehensive and Essential provider depending on the scope of services they choose to provide.



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Comprehensive Safety Net Provider Enrollment (cont.)

Each service location must complete a separate enrollment and pay a separate application fee.

Must enroll using the organization's federal Employer Identification Number (EIN).

Must have at least one enrolled, licensed Physician (Provider Type 05), Osteopath (Provider Type 26), Licensed Behavioral Health Clinician (Provider Type 38), or Licensed Psychologist (Provider Type 37) affiliated with the group.

Credentialed individuals (rendering providers) must be enrolled individually (separate enrollment) and affiliated with the group.

For new enrollments, the group must be approved prior to enrollment of the individual providers.



Essential Safety Net Provider Enrollment

There is not a distinct Provider Type or Specialty Type for Essential Safety Net Providers

There will be a “flag” for Essential Providers which must be selected in the enrollment portal

- Current Provider would submit maintenance request and select “Essential Flag” in the enrollment portal
- New Providers - Enroll under the appropriate Provider Type (e.g., provider type 64) based on your documentation of approved services uploaded for HCPF. Then select “Essential Flag” in the enrollment portal.

A provider may enroll as both a comprehensive provider and enroll in multiple provider types for essential services and “flag” essential provider for those services.



Essential Safety Net Provider Enrollment (cont.)

The “flag” triggers the providers ability to receive the standard essential reimbursement rate.

A Provider must be contracted with a Managed Care Entity (MCE) as a safety net provider to receive the standard reimbursement rate.

- MCEs are required to re-contract with existing providers who have secured Essential Safety Net approval status.
- MCEs may choose not to contract with newly approved providers based on network needs.

A Provider will receive the Essential standard rate, set by HCPF (or a higher rate negotiated with the MCE).

- A provider will receive the Essential standard rate based on the effective date of the MCE contract
- HCPF sends a weekly provider file and a quarterly file to the MCEs to update provider enrollment.



Important National Provider Identifier Reminder!

HB 18-1282 requires all organization health care providers (not individuals) to obtain and use a unique National Provider Identifier (NPI) for each service location and provider type enrolled with HCPF

Most providers may obtain an NPI at no cost that identifies the services provided at each of their sites

Providers should choose the taxonomy that best aligns with the services being provided at each location

For more information about NPIs, visit the [National Plan & Provider Enumeration System \(NPPES\) website](#)



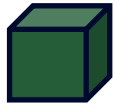
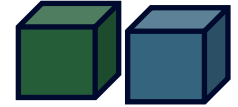
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Enrollment and NPIs and Dual Safety Net Approval Types



Comprehensive Safety Net Provider

- Comprehensive Provider approval is at the organization level
- Providers need to enroll each location as a Provider Type 78,
 - Upload the approval letter from the BHA
- Obtain an NPI number per location
- Need a new NPI and cannot use existing NPIs for enrollment as a Provider Type 78.

Comprehensive & Essential Safety Net Provider

- Obtain essential safety net approval for safety net services not covered as a comprehensive safety net provider
- Enroll as a provider type aligned with specific services for all essential services (e.g., withdrawal management and residential SUD- Provider Type 64)
 - Upload safety net provider approval letters from the BHA
 - For services that are both comprehensive and essential, enroll that location as only comprehensive (provider type 78)
- Obtain an NPI number per location **and per provider type**. ***If you had an NPI and enrollment for a specific essential service (e.g., SUD residential), you do NOT need a new NPI.**





What Might a License Transition Look Like For Your Agency?

Seven Scenarios

Transition Plans Based on Current Agency Licensure (part 1)

1

Is not currently licensed and/or designated by BHA nor has a BHE with CDPHE, and is interested or required to pursue this.



Familiarize yourself with the [updated BHA Provider Rules \(adopted 11/3/2023\)](#) and when ready, submit your [Letter of Intent](#) to obtain a username and access to submit your initial application in LADDERS.

Your agency's cycle will begin on or after January 1, 2024, and will be subject to the updated BHA Provider Rules from the initial point of licensure.

2

Is currently licensed and/or designated by BHA



Your agency will remain subject to the [current BHA Provider Rules \(2 CCR 502-1\)](#) until the expiration of your current BHA license(s). Submit your [Letter of Intent](#) to obtain an updated username and access to LADDERS at least sixty (60) days prior to your current license(s) expiration date.

Your agency will be subject to the updated BHA Provider Rules in alignment with your agency's application timeline.



Transition Plans Based on Current Agency Licensure (part 2)

3

Has multiple BHA-issued license(s) and/or designation cycle(s) that expire on the same date.



Your agency will transition to the [updated BHA Provider Rules \(adopted 11/3/2023\)](#) by submitting the [Letter of Intent](#) in LADDERS at least sixty (60) calendar days prior to the expiration of your current cycle.

4

Has multiple BHA-issued license(s) and/or designation cycle(s) that do NOT expire on the same date.



Transition to the [updated BHA Provider Rules \(adopted 11/3/2023\)](#) on the expiration date of the earliest cycle. Submit the [Letter of Intent](#) and obtain an updated username and access to LADDERS at least sixty (60) days prior to the earliest license and/or designation cycle's expiration date.

Transition Plans Based on Current Agency Licensure (part 3)

5

Is currently licensed by the Colorado Department of Public Health and Environment (CDPHE) as a Behavioral Health Entity (BHE).



Your agency's BHE license will transition from CDPHE to BHA on your current BHE's expiration date. Submit the [Letter of Intent](#) in LADDERS at least sixty (60) days prior to the earliest license and/or designation cycle's expiration date.

6

Is currently licensed by BHA and CDPHE and the BHA license expires after January 1, 2024, but before the expiration of the BHE license with CDPHE.



BHA will work with your agency to submit the [Letter of Intent](#) in LADDERS at least sixty (60) days prior to the earliest license and/or designation cycle's expiration date.

When applying for BHA BHE licensure, BHA will waive your first base BHE license fee and endorsement fees to compensate for the early surrender of your CDPHE BHE license.



Transition Plans Based on Current Agency Licensure (part 4)

7

Has multiple current licensure types, including ATU & CMHC.



Entities holding more than one ATU, CSU, Community Mental Health Center, or Community Mental Health Clinic license shall apply to become licensed as a BHE at the earliest renewal date of all licenses held.

Submit the [Letter of Intent](#) in LADDERS at least sixty (60) days prior to the earliest license and/or designation cycle's expiration date.



Exercise #2



True or False?

If your agency is currently licensed and/or designated by the BHA, your agency will be subject to the updated BHA Provider Rules in alignment with your agency's application timeline.



True or False?

If your agency has multiple BHA-issued license(s) and/or designation cycle(s) that do NOT expire on the same date, your agency will transition to the updated BHA Provider Rules (adopted 11/3/2023) on the expiration date of the earliest cycle.



True or False?

If your agency has multiple current licensure types, you should apply to become licensed as a BHE at the latest renewal date of all licenses held.



Exercise #2 Answers



True: If your agency is currently licensed and/or designated by the BHA, your agency will be subject to the updated BHA Provider Rules in alignment with your agency's application timeline.



True: If your agency has multiple BHA-issued license(s) and/or designation cycle(s) that do NOT expire on the same date, your agency will transition to the updated BHA Provider Rules (adopted 11/3/2023) on the expiration date of the earliest cycle.



False: If your agency has multiple current licensure types, you should apply to become licensed as a BHE at the **earliest** renewal date of all licenses held.



Transition Plans Based on Current Agency Licensure (continued)

Bonus

If your agency has a BHA license that expires after January 1, 2024, but before the expiration of your BHE license with CDPHE, BHA would like to work with your agency to submit the Letter of Intent in LADDERS at least sixty (60) days prior to the earliest license and/or designation cycle's expiration date.

When applying for BHA BHE licensure, BHA will waive your first base BHE license fee and endorsement fees to compensate for the early surrender of your CDPHE BHE license.








How Do Providers Start to Prepare for Making a Change and What Are Key Considerations?

Introduction to Key Considerations for Providers as They Determine the Right Fit for Their Organization or Practice.

Considerations for Becoming an Approved Safety Net Provider

- ✓ Aligns with strategic commitment to expand services for the safety net or specific priority population(s).  Committed to meeting high standards for accessibility and quality of the safety net services
- ✓ Aligns with strategic priority to expand services and become a larger and more complete service provider for your community.  Committed to proactively engaging hard-to-serve individuals and serving priority populations with a no reject approach as well as providing services such as care coordination
- ✓ Aligns with strategic priority of being able to demonstrate quality and value to community.  Committed to demonstrating quality and value through data sharing agreements to ensure access to data relevant to performance monitoring
- ✓ Aligns with strategic priority to build long-term sustainable revenue and reimbursement and opportunities for value-based payment.



BHA Licensure and Safety Net Approval

For providers wanting a BHA license and Safety Net approval, a provider must follow these steps:

1. Review applicable BHA license from [2 CCR 502-1](#).
2. Visit the [LADDERS licensing portal](#) to begin an application.
3. Complete the application for the licensure and or approval required. This includes uploading any required documentation.

Approval Process Fast Facts

Fee: FREE

When did applications open?
November 15, 2023

Approval Duration:
Two (2) years

When can I apply for safety net approval?
Anytime, There is no deadline!

Questions?

Email: cdhs_bharulefeedback@state.co.us

Webpage:

<https://bha.colorado.gov/resources/laws-rules>



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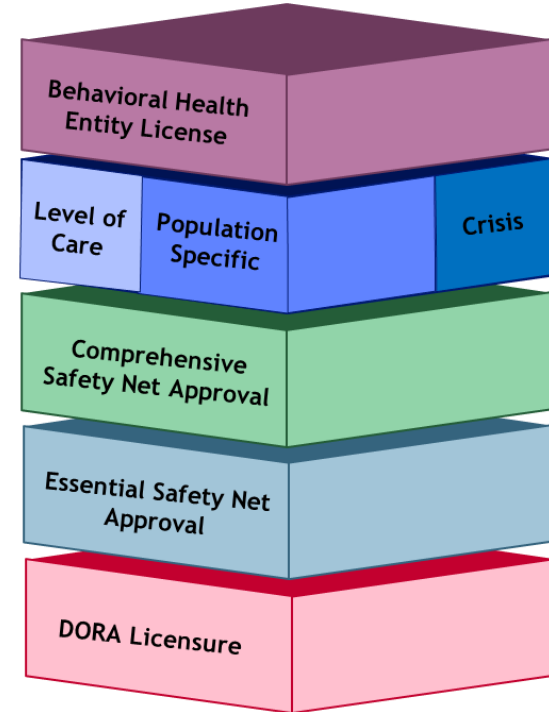


How Do the Foundational Building Blocks Fit Together?

Let's Discuss a Few Scenarios.

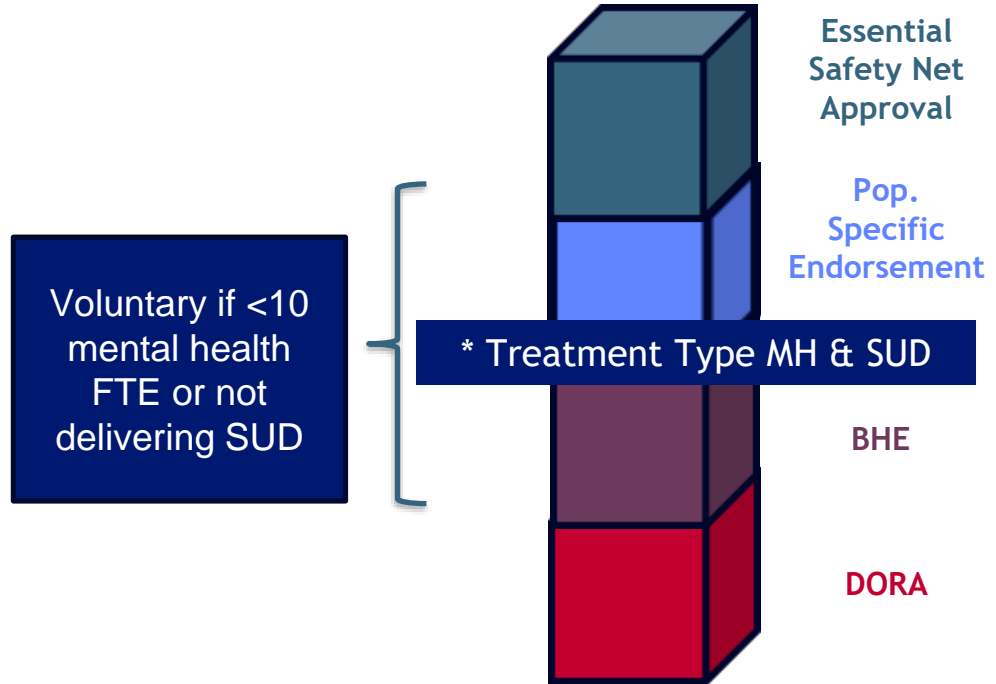
Let's Practice With How the Building Blocks Fit Together to Fit Your Agency's Requirements! As a reminder....

Behavioral Health Entity License	01
BHE Service Endorsements <ul style="list-style-type: none">• Level of Care Endorsements• Population Specific Endorsements• Crisis Endorsements	02
Comprehensive Safety Net Approval	03
Essential Safety Net Approval	04
Department of Regulatory Agencies (DORA) Licensure	05



Scenario #1

I am an independent provider with a DORA license and no organizational BHA license. My three provider colleagues and I primarily serve children and families. We do not provide SUD services. We align our practice model with safety net no refusal requirements. I have not been previously licensed by CDPHE nor am I currently designated by BHA. What am I eligible to apply for?



Let's Walk Through another Scenario

I am a community mental health center, and I offer all comprehensive services, as well as some essential services (residential SUD). I want to be approved as a safety net provider. What do I need to do under the new rules?

The CMHC will apply for their BHE license with the BHE once their BHE license with CDPHE, SUD license with BHA, or mental health designation with BHA expires (whichever expiration date is first). They will include all service they wish to provide as endorsements on their BHE license. They will indicate that they want to be a comprehensive provider (agency-wide approval) and indicate which locations offer essential services and apply for an essential provider approval for those services. They will seek a 27-65 Designation for outpatient certifications.

BONUS: What if I also operate an OTP?

The provider will need to obtain a [Controlled Substance License](#).



Controlled
Substance
License

Comprehensive
Safety Net
Approval

Essential
Safety Net
Approval

Endorsements

BHE



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HMA
HEALTH MANAGEMENT ASSOCIATES

Scenario #3

I am an administrator of an agency who currently holds a BHA designation as a Community Mental Health Center (CMHC). We provide:

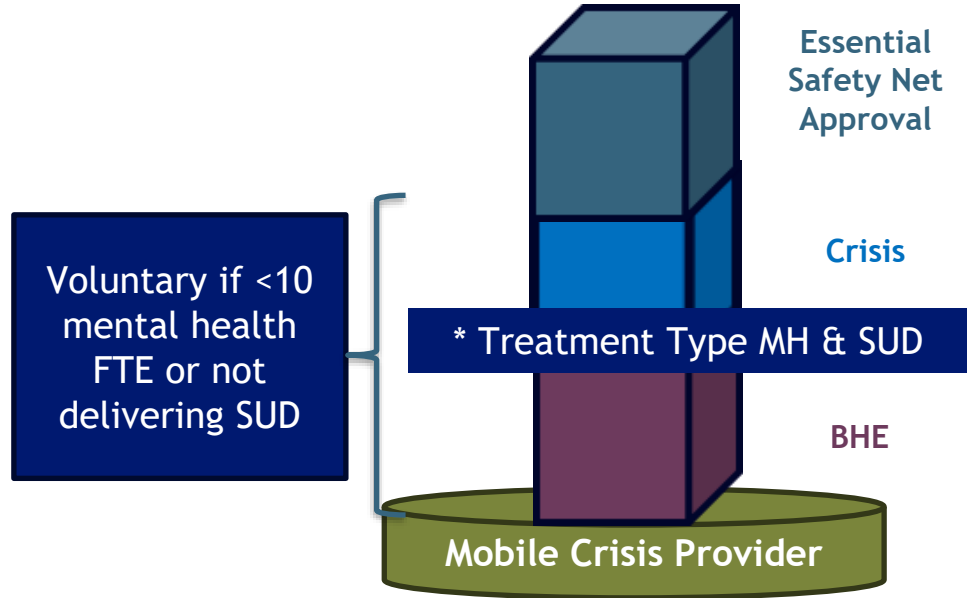
- Behavioral health outpatient services
- Crisis behavioral Health services
- Behavioral health high-intensity outpatient services
- Mental health and substance use outpatient services
- Mental health and substance use recovery supports
- Integrated care services
- Care management
- Outreach, education, and engagement services
- Screening, assessment, and diagnosis, including risk assessment, crisis planning, and monitoring to key health indicators
- Recovery supports
- Emergency and Involuntary Commitment
- Children and Families services
- Women's and Maternal Behavioral Health Treatment
- Criminal Justice-Involved Services



A Specific Service Scenario Regarding BHE

I am a mobile crisis provider. I have an endorsement letter from BHA. What do I need to continue participating in the mobile crisis benefit?

If the mobile crisis provider meets the definition of a BHE (for example, has ten or more fully licensed FTE behavioral health professionals or provides SUD services) then the provider would get a BHE with a mobile crisis endorsement. If the provider does not meet the definition of a BHE, they can voluntarily seek a BHE license with a mobile crisis endorsement or can choose to seek approval as an essential safety net provider for mobile crisis services.



You Might Ask?

If I was previously licensed by CDPHE, does that convert to a BHE license automatically?

In short, no. Facilities that are currently licensed with CDPHE, will need to transition to a BHE license. BHA rules cite. [2 CCR 502-1 Part 2.2.A](#): Entities previously licensed as described in part 2.2.A of this Chapter shall seek an initial BHE license at least sixty (60) calendar days prior to the expiration of their existing license.

Let's Look At a Specific Scenario...

I am a Community Mental Health Center, and I offer all comprehensive services as well as some essential services. I want to be approved as a safety net provider, what do I need to do under the new rules?

The CMHC will apply for their BHE license with the BHA once their BHE license with CDPHE, SUD license with BHA, or mental health designation with BHA expires (whichever expiration date is first). They will include all services they wish to provide as endorsements on their BHE license.

They will indicate that they want to be a comprehensive provider (agency-wide approval) and indicate which locations offer essential services and apply for an essential provider approval for those services. They will seek a 27-65 Designation for outpatient certifications.

To better inform our future trainings and request topics for office hours, please complete this short survey. Use the QR code or short URL to access it. Your feedback is important. Thank you!



<https://bit.ly/bhprovidertrainingsurvey>



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Appendix A: Additional Resources

Office Hours

Office Hours are offered on the last Friday of every month (through September 2024) at noon MT! Please visit the [HCPF Safety Net Landing Page](#) for details & registration information.

Listserv

Join the Listserv to receive notifications of trainings, technical assistance, and other stakeholder engagement opportunities: [Register Here](#)

HCPF Safety Net Provider Website

Visit the website for details on upcoming training topics and announcements, training recordings and presentation decks, FAQs and more: <https://hcpf.colorado.gov/safetynetproviders>

TTA Request Form and E-Mail

Request TTA support or share your ideas, questions and concerns about this effort using the [TTA Request Form](#) or e-mail questions and comments to: info@safetynetproviders.com



Appendix B: References

[Behavioral health designation and licensing | Behavioral Health Administration \(colorado.gov\)](#)

[socgov06.my.salesforce-sites.com/LADDERS](#)

[Colorado CCR Document List \(state.co.us\)](#)

[Individuals At Risk Of Institutionalization | Colorado General Assembly](#)