

# Independent Provider Network Collaborative

September 5, 2025

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Department of Health Care Policy & Financing



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

# Agenda

- Communications Update
- Policy Update
- Billing and Coding Update
- ACC Phase III Update
- Q&A

*\*Reminder: Please share questions/comments in chat function*

# Communications Update

- Visit the Behavioral Health webpage:  
<https://hcpf.colorado.gov/behavioral-health>
- Sign up for Office Hours & Forums via the calendar on the landing page
  - *Note: Monthly IPN Office Hours on the first Friday of the month*
- Sign up for the [Health First Colorado Behavioral Health Updates](#) newsletter
- Sign up for [Provider Bulletins](#) & the [ACC newsletter](#)

## Calendar

Events listed on this calendar include all public-facing BHIC-hosted events regarding behavioral health topics. To sign up, select the individual event listings for more information and registration links.

SUN 31	MON Sep 1	TUE 2	WED 3	THU 4	FRI 5	SAT 6
		• 2pm CCBHC Certification an	• 2pm SUD Office Hours		• 9am Hospital Stakeholder Er • 1pm IPN Collaborative Forum	
7	8	• 12pm HCPF Safety Net with t	• 10am Children's Disability Ar	• 2pm Supportive Housing Off	12	13
14	15	• 2pm CCBHC Quality Measur	• 2pm CCBHC Prospective Pa	• 11am CO-SOC Implementati • 12pm Serious Mental Illness	19	20
21	22		• 1pm CCBHC Monthly Stakeh	• 11:30am Peer Support Forurr • 3pm MHTL Level 2 Office Ho	26	27
28	• 3pm CCBHC Steering Comm	30	Oct 1 • 2pm SUD Provider Forum	2	3 • 1pm IPN Office Hours	4

BHIC Public Calendar  
Events shown in time zone: (GMT-06:00) Mountain Time - Denver  
Add to Google Calendar

Google Calendar

# Communications Update

- *Bookmark this link:* Understanding the Impact of Federal Changes to Medicaid - <https://hcpf.colorado.gov/impact>
- To stay informed on the Accountable Care Collaborative (ACC) and the Program Improvement Advisory Committee (PIAC) subscribe to the PIAC listserv
  - <https://hcpf.colorado.gov/accountable-care-collaborative-program-improvement-advisory-committee>
- Other opportunities for engagement include the monthly [Behavioral Health and Integration Strategies Subcommittee meetings](#)

# Policy Updates

# Draft Supervision Policy for Medicaid Billable Behavioral Health Services

## Timeline on Stakeholder Engagement & Policy Update

Draft update to  
Medicaid Billable  
Services  
Supervision Policy

Post Revised Draft to the  
Policy (incorporating  
first round of feedback)  
and summary feedback  
document

Policy takes effect  
January 1, 2026

Aug. 2025

Oct. 2025

Sept. 2025

Jan 2026

July  
2025

Solicit feedback and  
complete stakeholder  
engagement through  
August 30, 2025

Post Final Policy  
October 31, 2025

# Update on ASAM 4 Transition

BHA and HCPF, along with the SUD provider community, are working to align Colorado's behavioral health systems with the [4th Edition](#) of the American Society of Addiction Medicine (ASAM, 4th Ed.)

To ensure the relevant behavioral health providers have sufficient time to transition effectively, Colorado's implementation deadline **has been extended to July 1, 2027**. Impacted providers are expected to implement transition plans and achieve the necessary milestones for their agency to ensure full alignment with ASAM 4th Edition standards prior to July 1, 2027.

# Billing and Coding Updates

- A new edition of SBHS Billing Manual is published each quarter
  - A Change Tracking Log is published with each edition
  - Next edition will be published **October 1st**
- Please bookmark and look at: <https://hcpf.colorado.gov/sbhs-billing-manual>
- Also note the Behavioral Health Policies, Standards, and Billing References webpage: <https://hcpf.colorado.gov/bh-policies>



# National Correct Coding Initiative (NCCI) Edits

CMS created the NCCI to reduce improper payments stemming from incorrect coding and billing practices. NCCI prevents reimbursement for inappropriate combinations of CPT codes. The following are the three types of NCCI Edits:

- **Add-on Code (AOC)** edits ensure add-on codes are not billed without a primary procedure code.
- **Medically Unlikely Edits (MUEs)** prevent inappropriate payments when services are reported with an unusually high number of units of service.
- **Procedure to Procedure (PTP)** edits prevent code pairs that should not be reported together on the same date of service.

Visit CMS' [NCCI for Medicaid](#) website for more information on NCCI edits

**Effective July 1, 2025, HCPF began requiring RAEs to implement all NCCI edits in accordance with CMS requirements.**

# Colorado MUEs & PTP

Effective October 1, 2025, HCPF is requiring RAEs to implement Colorado specific medically unlikely edits (MUEs) and Colorado specific procedure to procedure (PTP) edits. Services billed in excess of the CO MUE will receive a denial message regarding the MUE limit being exceeded; providers have a right to appeal denials and submit necessary clinical documentation to the RAE, for a determination if more units should be allotted.

- **Medically Unlikely Edits (MUEs)** prevent inappropriate payments when services are reported with an unusually high number of units of service.
- **Procedure to Procedure (PTP)** edits prevent code pairs that should not be reported together on the same date of service.

Visit HCPF's [BH Policies webpage](#) for more information on CO MUEs & CO PTP

# Behavioral Health Group Practices Provider Type Guidance

HCPF created Provider Type 77 - Behavioral Health Group, effective January 1, 2024 to create more network specificity for group practices who deliver behavioral health services. Many group providers are currently enrolled with Medicaid as a Non-Physician Practitioner Group (PT 25) or a Clinic Practitioner (PT 16). The PT 25 and PT 16 enrollments do not allow HCPF to differentiate between providers who primarily deliver behavioral health services, compared to those who primarily deliver medical services or integrated care.

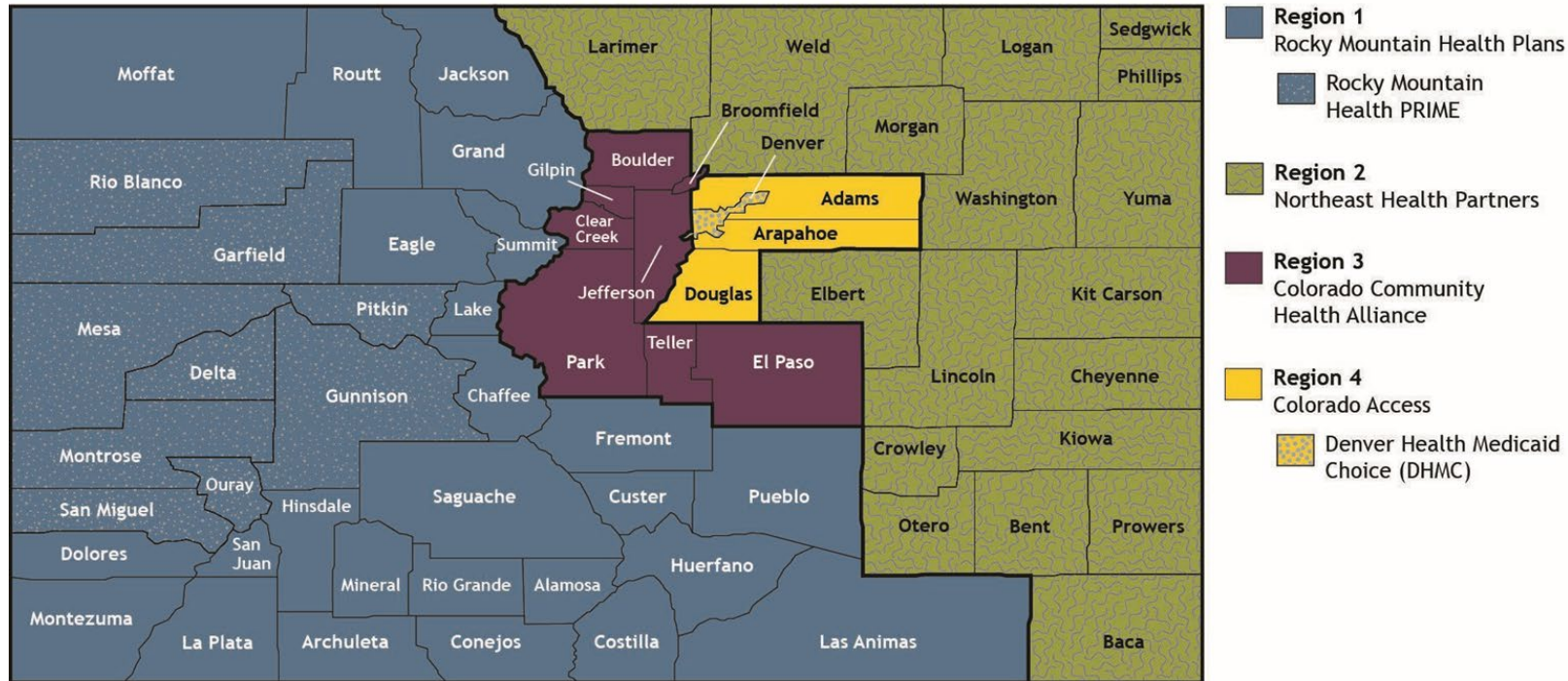
# Behavioral Health Group Practices Provider Type Guidance, cont.

HCPF issues the following guidance for behavioral health group practices:

- All newly enrolling Medicaid providers that only deliver behavioral health services must enroll as PT 77 - Behavioral Health Group.
- Current Medicaid providers enrolled as PT 25 or PT 16 that only provide behavioral health services must re-enroll as a PT 77 upon revalidation or when making an update to their enrollment.

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


# ACC Phase III Resources



Critical issues log for issues related to the implementation of ACC Phase III is posted on the [ACC webpage](#)

# Questions?





Monthly IPN Office Hours  
First Friday of the month  
(when there's no Forum)  
1-2 PM

[hcpf\\_bhbenefits@state.co.us](mailto:hcpf_bhbenefits@state.co.us)



Next IPN Collaborative  
December 5, 2025  
1-2:30 PM

[hcpf\\_bhbenefits@state.co.us](mailto:hcpf_bhbenefits@state.co.us)

