

# CCBHC Certification and Provider Readiness Subcommittee

April 1, 2025



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



**COLORADO**  
Behavioral Health  
Administration

# Agenda

- Meeting Expectations
- Introductions
- Alignment, level-setting, overlap
  - Who, what, why, when, how?
  - Exploration of options and opportunities
- Open discussion

# CCBHC Planning Grant Goals

Colorado's participation in the CCBHC Planning Grant is a part of a state-wide, multi-agency effort to expand Colorado's behavioral health system of care.

The Planning Grant will allow HCPF and BHA to **explore how the CCBHC model could complement the Colorado Safety Net System** to promote integrated and accessible behavioral health care with sustainable funding practices.

## Our goals:

1. Establish realistic implementation plan understanding cost and timeline.
2. Determine if the CCBHC model the best way to improve the Behavioral Health Safety Net system in Colorado.

# CCBHC 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			

# Meeting Expectations

## Subcommittee Goal:

- Discuss and gather input from stakeholders to build a plan that will help us move from our current state to a CCBHC driven model that works well for all Coloradans.

## Meeting Ground Rules:

- Slide decks will be posted after the meeting on the CCBHC webpage
- Ask questions at any time using the chat. Raised hands will be called upon at the speaker's discretion.

# Introductions

- Tell us who we're working with!
  - Name, pronouns if you'd like
  - The organization you represent
- Tell us what you hope to get out of your participation in this Subcommittee?

# Context and Considerations

Recent significant change:

- 2024: Legacy → Behavioral Health Entity (BHE) licensing, Safety Net Approvals, etc.

More change on the horizon:

- Controlled Substance License (CSL) and Safety Net updates (to SBHS in May 2025)
- BHASOs coming (July 2025)
- CCBHC Planning Grant application (April 2026)
- ASAM 4th Edition alignment (July 2026)

# How will we get there?

## Regulatory Affairs Unit

- Responsible for all BHA-involved rules:
  - BHA Provider Rules found at 2 CCR 502-1;
  - BHA System Rules found at 2 CCR 502-5; and
  - BHA Administrative Rules found at 2 CCR 502-6.

 Meet the unit-in-development! 

- Here today: Mary Anna Sears, Caitlin Long, Marius Nielsen
- Coming soon: Thom Miller, Shane Oram, Brittany Noble



# Alignment and Overlap

- Pinning down the moving target(s)
- Coupling similar/overlapping work of CCBHC certification needs with statewide transition to the 4th Edition of the ASAM Criteria
  - Exploring options
    - Shared effective dates
    - Split effective dates
    - Best way to capture and implement requirements
    - Etc.

# What We Know

- Subject to State Board of Human Services (SBHS) rule promulgation process
  - Start at the end: What is target effective date?
  - Work backwards from there
    - Minus (-) at least 2 months: 1st and 2nd Read
    - Minus (x) months, based on factors including number of pages to review: Attorneys General review
    - Minus (y) amount of time: feedback inclusion
    - Minus (z) amount of time: community engagement
- Meeting with SBHS Administrator this month

# Starting Point

Initial thoughts:

- BHA Provider Rules for Certification standards
  - Dedicated Chapter for CCBHC certification
- BHA Administrative Rules for Data Measures
- Updated in tandem, support each other

# Timeline option\*

## Shared effective date (July 1, 2026)

Timeframe	ASAM 4th Ed.	CCBHC Certification	Note
Spring-Summer 2025	Rule drafting, engagement planning		Continue in existing CCBHC spaces
Fall 2025	Community Engagement (formal feedback period)		-
Winter 2025	Legal review		Anticipated legal review will be longer due to increased number of pages with shared timeline
Spring 2026	SBHS rule process		CCBHC application due by April 2026
July 1, 2026	Full Alignment with rules		Allows demonstration to begin as early as 7/1/26

# Timeline option, continued\*

Uncoupled effective dates (7/1/26 for ASAM, no later than 7/1/27 for CCBHC demonstration)

Timeframe	ASAM 4th Ed.	CCBHC Certification	Note
Spring-Summer 2025	Rule drafting, engagement planning	Focus on building the structure	Continue in existing CCBHC spaces
Fall 2025	Community Engagement (formal feedback period)		
Winter 2025	Legal review		
Spring 2026	SBHS rule process	CCBHC application due in April 2026	-
Summer 2026	July 1, 2026: full alignment with rules required	CCBHC application response expected	Proceed with CCBHC rule drafting and formal community engagement process if demonstration granted. Have the ability to select our targeted effective date for state. Shorter review period for AG's office expected.
(no later than) Fall/early Winter 2026		Community engagement (formal feedback period)	
Spring 2027		SBHS rule process	
Summer 2027		CCBHC rules take effect no later than July 1	



# Thoughts? Questions?

# Next Steps

## Certification & Provider Readiness Subcommittee:

- First Tuesday of the month at 2pm via Zoom
- Next meeting: Tues., May 6 at 2pm

## Future topic(s):

- Timeline review with harder targets in place
- What are your priorities?

# Contact Information

HCPF Behavioral Health Benefits Inbox:

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

Learn More about CCBHCs on the HCPF CCBHC webpage:

[hcpf.colorado.gov/ccbhc](http://hcpf.colorado.gov/ccbhc)

Mary Anna Sears - BHA

Team Lead for the BHA certification process

[cdhs\\_bharulefeedback@state.co.us](mailto:cdhs_bharulefeedback@state.co.us)





# Newsletter Sign-up

Visit the Behavioral Health Benefits page for resources, information, calendar of upcoming events, and to sign up for the monthly behavioral health newsletter:

<https://hcpf.colorado.gov/behavioral-health>



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# Thank you!



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