

CCBHC Planning Grant Status Report, HB24-1384

*Status report on Colorado application for the Certified
Community Behavioral Health Clinic Planning Grant*

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Submitted to: Joint Budget Committee



COLORADO
Behavioral Health
Administration



COLORADO
Department of Health Care
Policy & Financing

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Executive Summary

On September 11, 2024, the Department of Health Care Policy & Financing (HCPF), in partnership with the Behavioral Health Administration (BHA), submitted an application to the Substance Abuse and Mental Health Service Administration (SAMHSA) for the 2024 Certified Community Behavioral Health Clinic (CCBHC) Planning Grant. The Notice of Funding Opportunity for the CCBHC Planning Grant was made available to states on July 24, 2024, with an application deadline of September 12, 2024.

On December 31, 2024, HCPF was awarded a one year, \$1 million planning grant by SAMHSA. The planning grant project period is December 31, 2024 to December 30, 2025.

HCPF and BHA began preparatory collaborative efforts in May of 2024. Stakeholder activities, forums and interviews were planned and executed starting in June of 2024. These activities include a state led CCBHC Stakeholder Forum that was held twice monthly from July, 2024 through December, 2024. HCPF also conducted virtual interviews with each of the six current and one former Colorado individual CCBHC Expansion Grant recipients in August of 2024.

Background

[Colorado House Bill 24-1384](#) Certified Community Behavioral Health Clinics mandated HCPF, in collaboration with the BHA, to apply to SAMHSA for a CCBHC Planning Grant. The [Notice of Funding Opportunity](#) was released July 29, 2024. The goal of the Planning Grant is to “support states in developing and implementing certification systems for CCBHCs; establish Prospective Payment Systems (PPS) for Medicaid reimbursable behavioral health services; and prepare an application to participate in a four-year CCBHC Demonstration program.” Implementing the Planning Grant will require extensive engagement with stakeholders with a focus on individuals with lived experience and existing CCBHC sites to provide input into these key activities.

In 2023, Colorado applied for an earlier round of CCBHC Planning Grant funding, scoring 84% on the application, but was not selected for an award. HCPF is committed, in partnership with the BHA, to revising our planning grant proposal to strengthen areas where feedback was received from community partners and directly from SAMHSA.

In this 2024 application, we worked to ensure there are no technical deficits and to meet all grant requirements. The state is in a better position to demonstrate our commitment to the CCBHC model for this application cycle, based on the passage of aligned certification criteria in the BHA rules and implementation of a PPS launched on July 1, 2024, for Comprehensive Safety Net Providers (CSNPs) that is also based on the CCBHC model. HCPF hired HMA, a vendor with significant experience in CCBHC applications, to complete an assessment of the previous application including strengths and weaknesses, and draft the most compelling application possible.

The [Notice of Funding Opportunity](#) was released July 29, 2024, significantly earlier than when it was released for the 2023 grant. With a submission deadline of September 12, 2024, HCPF and the BHA had only six weeks to complete the application for this \$1 million planning grant. Additionally, application size was reduced from a limit of 30 pages to 20 pages, creating difficult choices on what content to include and exclude. However, HCPF successfully met the required SAMHSA deadline by submitting the completed application on September 11, 2024.

The CCBHC Planning Grant is the first of a two-phase process. The second phase involves state participation in a four-year CCBHC Demonstration program (also referred to as the [Section 223 Demonstration](#)). After the one-year duration of the planning grant period, states will be given a six-month no-cost planning period extension opportunity, which they may choose to utilize in whole, in part, or forgo. States participating in the 2025 grant round are allowed to submit applications for participation in the CCBHC Demonstration program no later than April 1, 2026. States are allowed to choose a start date that is on or after July 1, 2026.

At this time, there are no substantial changes to the CCBHC model or the related federal funding that would negatively affect the state of Colorado. HCPF and BHA will proceed with the planning grant period and intend to submit a proposal for participation in the CCBHC Demonstration Program in 2026. Based on the legislation, HCPF and BHA will work with the stakeholders to determine if the demonstration meets all state identified criteria as well. We will comply with all necessary guidelines established by SAMHSA as a CCBHC grant awardee.

Key Grant Application Preparation Activities

The CCBHC Planning Grant and Demonstration Program will require extensive analysis, research, data collection, and documentation, ensuring fidelity to the evidence based national model. The application developed by HCPF and BHA outlined Colorado's plans to ensure success in these areas as well as a strategy to ensure productive and effective engagement with stakeholders.

The commitment to engagement with stakeholders began during preparation for the grant application. As part of this robust stakeholder engagement process, a draft of the Colorado CCBHC Planning Grant Application Narrative and a Feedback Survey were made available to stakeholders during the application preparation process from August 28, 2024, through November 7, 2024, with a first round of feedback (due to HCPF by September 6, 2024) collected and incorporated into the final iteration of the Narrative prior to submission of all application materials on September 11, 2024. 81.5% of responses were favorable to the procedural direction outlined in the CCBHC Planning Grant Application Narrative. The survey was posted to HCPF's [CCBHC webpage](#) along with the submitted narrative. HCPF and BHA will continue to review and incorporate written and other feedback through future surveys and

other means and modes of information collection as it becomes available during the planning grant period.

The HCPF and BHA joint effort to develop content for the application was centered on the required components outlined in HB 24-1387, which included:

- I. The requirement to serve priority populations, as defined in Colorado Revised Statute (CRS),
- II. The provision of Behavioral Health Safety Net Services, as defined in CRS,
- III. The requirement for a CCBHC to serve all populations regardless of an individual's condition or ability to pay for services, as described in CRS,
- IV. The requirement for CCBHC services to include Peer Supports and Peer counseling,
- V. The requirement for incorporating meaningful participation from individuals with lived experience,
- VI. The requirement for the development of Quality and Reporting measures which meet federal CCBHC guidelines but do not limit the state to CCBHC outcome or reporting requirements alone,
- VII. The assurance that any BHA designated Comprehensive or Essential Safety Net provider may seek CCBHC certification under developed certification processes,
- VIII. The protection from any geographical limits on the number of CCBHCs in a region,
- IX. The requirement that any and all CCBHC Crisis Services are aligned with and delivered within the existing statewide crisis response system and regulations; and that services do not duplicate or impede existing systems,
- X. The assurance of no negative impact on rural behavioral healthcare access secondary to state certification of CCBHCs, and
- XI. The assurance that HCPF will have the ability to implement financial accountability standards for providers.

Below is an overview of the additional activities completed in support of the CCBHC Planning Grant application process utilizing HB 24-1384 directives in driving strategy:

- **Facilitated Stakeholder Engagement**
 - Held four (4) public stakeholder forums in Fall of 2024 on the CCBHC planning grant application plan (July 24, August 7, August 21, and September 4) with presentations, discussions, and opportunities to share written feedback.
 - Ongoing CCBHC Stakeholder Forums were held with external partners on a fortnightly basis from July 2024 through December 2024 in preparation for CCBHC related work to take place in 2025.
 - Stakeholder groups reached through the forum include: Current and Future Providers, Trade organizations and representatives, Community based organizations, Individuals currently or previously seeking care in

- the Colorado Behavioral Healthcare system, State Department Staff, and Community & Patient advocacy groups
- Completed learning sessions with key stakeholders and other thought partners:
 - State of Missouri
 - State of Maine
 - Mental Health Colorado
 - Colorado Behavioral Health Council
 - Current and former federal CCBHC expansion grantee organizations including:
 - Denver Health & Hospital Authority
 - Jefferson Center for Mental Health
 - Aurora Center of Health and Recovery with Colorado Access
 - North Range Behavioral Health
 - SolVista Health
 - Southwest Colorado Mental Health Center, Inc (Axis Health)
 - Mental Health Partners
- Solicited letters of commitment and letters of support for the planning grant application through newsletters, forums, advocacy groups, and targeted requests.
- Ensured frequent BHA/HCPF team collaboration meetings of at least twice weekly during the 7-week grant application process and regular, but less frequent check-ins after successful application submission
- Developed [a CCBHC website](#) with information and resources
- Conducted meta-analysis of Colorado populations, current needs, capacity, and access to behavioral health
- Hired HMA, a vendor with extensive CCBHC experience, to assist in the Planning Grant Application (and budgeted to support the Demonstration Program application in the Planning Grant)
- Reviewed available vendors, scopes of work, and budgets required to prepare for the Demonstration Program
- Evaluated appropriate state agency roles and responsibilities for the Planning and Demonstration Years
- Attended CCBHC Annual State Meeting and National Council Technical Assistance meetings

Next Steps

HCPF and BHA will use the one-year, one-million dollar planning grant to develop a CCBHC Demonstration plan and application, and determine how to implement the CCBHC model in the Colorado Safety Net System, promoting Colorado’s overall goal of integrated and accessible behavioral health care with sustainable funding practices.

The Colorado CCBHC Planning Grant will support the following activities:

- Conducting a policy gap analysis of Colorado’s current metrics compared to required CCBHC metrics to inform an implementation plan for the demonstration project.
- Developing a CCBHC certification and decertification process utilizing SAMHSA guidelines.
- Engaging stakeholders, with a special emphasis paid to involving Medicaid members and provider groups, and community members with lived experience in the behavioral health system to ensure the needs and voices of both communities are reflected in the planning and demonstration period.
- Establishing robust cross agency data collection and performance measures processes for the demonstration period.
- Exploring and choosing a PPS methodology 1 (daily rate, inclusive of crisis services) for CCBHC service provision and how it will align with the current PPS methodology introduced July 1, 2024, for Comprehensive Safety Net Providers. PPS methodology 3 (daily rate with crisis services carved out) will also be considered.
- Completing a comprehensive fiscal analysis that will allow officials and stakeholders to weigh the potential benefits and estimation funding increases with the fiscal impact of increased oversight, system, and administrative costs.
- Drafting of a comprehensive and cohesive implementation plan and completion of a proposal for Colorado’s participation in the CCBHC Demonstration Program, if it is determined to be in the best interest of Colorado.

During the Planning Grant year, HCPF and the BHA will determine if it is in the best interest of the state to participate in a no-cost planning period extension, and then finalize a decision on whether to move forward with participation in the CCBHC Demonstration program based on statutory criteria as well as budgetary considerations. The Demonstration program allows states to claim CCBHC related expenditures at an enhanced Federal Medical Assistance Percentage (FMAP) of 67% for 16 quarters from the states’ chosen demonstration start date. It is critical to note that this enhanced FMAP is not permanent, but rather is a time limited benefit under the grant. It will be necessary to establish a sustainability plan that addresses this funding cliff that occurs at the end of the 4 year Demonstration period. Additionally, states are expected to codify, through State Plan Amendment, the service, regulatory, and funding practices and processes established during the Demonstration.

HCPF and BHA would like to extend gratitude to all stakeholders who informed the application and continue to be engaged in creating the best system of care for Colorado.