



SB 23-002: Medicaid Reimbursement for Community Health Workers

Questions will be released in phases and many questions are still actively being determined by HCPF. The best way to stay up to date with the implementation of the CHW benefit is to join the HCPF CHW [mailing list](#). If you have any questions, please contact [HCPF CHW Benefit@state.co.us](mailto:HCPF_CHW_Benefit@state.co.us).

Community Health Workers and SB 23-002

1. What is a Community Health Worker (CHW)?

- a. The American Public Health Association (APHA) defines “Community Health Worker” as a frontline public health worker who is a trusted member of, and has a close understanding of, the community that worker serves. This trusting relationship enables the worker to serve as a liaison between health and social services and improve the quality and cultural competency of service delivery. “Community Health Worker” is meant to be an umbrella term for individuals who may go by many names, such as Health Promoters, Community Outreach Workers, Promotores or Promotoras de salud, Health Navigators, or Patient Navigators.

2. What is SB 23-002 and what does this mean for current community health workers?

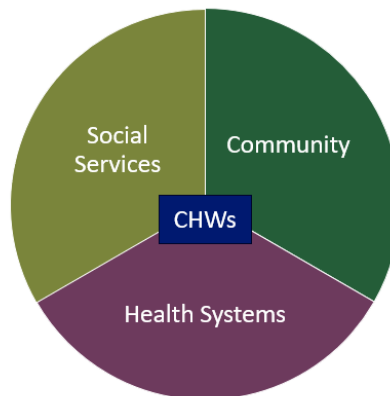
- a. In May 2023, the Colorado Legislature passed Senate Bill 23-002. This adds community health worker services as a Health First Colorado (Colorado’s Medicaid) covered benefit starting on July 1, 2025.

3. What is the implementation timeline for SB 23-002?

Passing of Bill <i>(May 2023)</i>	Research and Development Phase <i>(May 2023-Feb 2024)</i>	Promulgation Phase <i>(Feb 2024- July 2024)</i>	Implementation Phase <i>(July 2024- July 2025)</i>
Senate Bill 23-002 passed and signed by Gov. Polis	Utilize project management principles to engage internal working teams and external stakeholders to inform CHW reimbursement policy development	Following existing formal policy promulgation process including public comment, consultation summary, and appropriate notices	Identify and establish processes for necessary systems, technical, or operational changes to support final policy implementation

4. How do community health workers fit into the health care delivery system?

- a. Community health workers wear many hats and provide several different types of services to patients and clients. CHWs are the bridge between communities, and the health and social systems and often work in settings like hospitals, public health departments, and community-based organizations. CHWs can also contract with the Regional Accountable Entities (RAEs), for care coordination-related activities.



5. How is the new community health worker benefit being funded?

- a. Funding for SB23-002 comes from the State's General Fund and Medicaid federal funds. Funding for care coordination-related activities comes from the RAEs.

Federal Authority Options

1. Why did HCPF decide to go with the State Plan Amendment option?

- a. CMS encourages states to go with the State Plan Amendment (SPA) option instead of an 1115 demonstration waiver option. The SPA option also lowers the administrative burden to the state and the federal government. Additionally, due to timelines and stakeholder feedback, HCPF confirmed that this was the best option for HCPF to move forward with.

2. What is Fee-for-Service (FFS) and what does it mean for CHW services?

- a. Health First Colorado (Colorado Medicaid) reimburses physical health services fee-for-service, this means that CHW services will mostly be reimbursed fee-for-service. Care coordination-related activities are the exception as CHWs will need to contract with RAEs for reimbursement for those services.

Services, Qualifying Conditions, and Medical Necessity

1. What services can CHWs provide?

- a. Official CHW service definitions will be released in the coming months once approved the SPA is approved by the Centers for Medicare and Medicaid (CMS). HCPF recognizes that community health workers offer a broad range of services, however, Medicaid will not be able to reimburse for all services within a CHW's scope of work.

2. What is medical necessity?

- a. The definition of Medical Necessity for the Health First Colorado program can be found in the Department's rules at this citation

3. Is case management for Long Term Services and Supports (LTSS) a billable service for CHWs?

- a. No. For LTSS, the Department of Health Care Policy and Financing Office of Community Living (HCPF-OCL) has a contractual relationship with Case Management Agencies (CMA) to provide the administration of Case Management Agency activities for Health First Colorado (Colorado's

- Medicaid) members that are seeking Long Term Services and Supports (LTSS) and Home and Community Based Services (HCBS) waiver services. Additionally, Case Management Agencies provide Targeted Case Management Services for members enrolled in LTSS and HCBS waivers. Case Management for CHWs is not under the purview of HCPF or CMAs and is not part of Targeted Case Management services. Care coordination refers to the full continuum of supportive activities ranging from health promotion to complex case management. Additional guidance regarding care coordination and CHWs will be released closer to the benefit going live.
- 4. Can experimental services be covered CHW services?**
 - a. Health First Colorado (Colorado Medicaid) does not cover experimental or investigational treatments in accordance with [10 C.C.R. 2505-10 8.076.1.8.f](#).
 - 5. Are there any prior authorization limitations?**
 - a. Benefit limitations, including amount, duration, reimbursement rates, and whether Prior Authorization will be necessary, have not yet been determined. In other states, Medicaid agencies have set a daily or monthly limit. Prior authorization is needed once those limits have been met.

Training, Certification, and the CDPHE Registry

- 1. What are the requirements to become a registered CHW?**
 - a. To receive a Community Health Worker credential and be placed on the Colorado Community Health Worker Registry, an individual must:
 1. Participate in a CDPHE-recognized Community Health Worker Training program,
 2. Complete and pass the state Community Health Worker Assessment

CDPHE is currently developing an alternative work experience pathway and will provide information once that is finalized. Individuals applying for the Community Health Worker credential through work experience will still need to complete and pass the state Community Health Worker Assessment.
- 2. What programs are currently recognized by CDPHE for the Community Health Worker assessment?**
 - a. Currently, CDPHE recognizes three Health Navigator Training programs. Information on each of those programs can be found on the [CDPHE website](#). In 2023, CDPHE adopted the umbrella term “Community Health Worker” for the workforce in Colorado. CDPHE, together with a group of stakeholders, revised the Health Navigator core competencies to a new set of 8 (eight) Community Health Worker core competencies. In the year ahead, training programs will adapt their curricula to the new core competencies and will reapply to be recognized as Community Health Worker training programs. In 2023, CDPHE adopted the umbrella term “Community Health Worker” for the workforce in Colorado. CDPHE, together with a group of stakeholders, revised the Health Navigator core competencies to a new set of 8 (eight) Community Health Worker core competencies. In the year ahead, training programs will adapt their curricula to the new core competencies and will reapply to be recognized as Community Health Worker training programs.
- 3. Will the certified worker or the organization employing the certified worker be reimbursed? What documentation will be required to justify the reimbursement, if any?**
 - a. Only registry-listed, credentialed CHWs who are affiliated with a clinic or CBO will be eligible for Colorado Medicaid enrollment and reimbursement. CHWs will not be individual billers, meaning the CHW would need to affiliate with a group (like a clinic or a CBO) and that group would submit claims on their behalf. To be registry-listed/credentialed, a person must complete a CDPHE-approved CHW training program and pass a competency assessment. CDPHE is currently transitioning the CHW registry and credentialing process to streamline documentation, however, at minimum, verification of the training from the approved program, and verification of assessment passing are required to be registry-listed/credentialed. Guidance on documentation requirements will be released closer to the benefit going live.

- 4. Is the process taking into consideration languages spoken/read and the possibility that many CHWs may not have literacy (reading/writing) skills that allow them to take tests? How is language skill being taken into consideration?**
 - a. CDPHE is working with The Center for Advancing Professional Excellence (CAPE) to develop a new written Community Health Worker competency assessment, that should be available in the Spring of 2025. CAPE will develop the new assessment in partnership with an advisory group to ensure the assessment is accessible.
- 6. Will the training and assessment requirements be able to acknowledge, and support previous work experience of providing CHW services rather than a written test of some kind?**
 - a. CDPHE is currently developing an alternative work experience pathway and will provide information once that is finalized. Individuals applying for the Community Health Worker credential through work experience will still need to complete and pass the state Community Health Worker Assessment.
- 7. Are existing CHW trainings being considered? How can those trainings become certified for the registry?**
 - a. Currently, CDPHE recognizes three Health Navigator Training Programs. Information on each of those programs can be found on the [CDPHE website](#). In May 2024, CDPHE will release a Community Health Worker Training Program application for organizations interested in applying for recognition for a Community Health Worker Training Program.
- 8. Will CDPHE be collecting feedback from CHWs about the requirement and training process?**
 - a. As part of CDPHE's efforts to expand the Community Health Worker infrastructure, we will be evaluating the efforts of the initiative, including looking at the effectiveness and efficiency of the various infrastructure changes. This effort involves getting feedback from Community Health Workers.
- 9. Is this registry different from the current Health Navigation registry?**
 - a. In 2023, CDPHE adopted the umbrella term "Community Health Worker" for the workforce in Colorado. CDPHE, together with a group of stakeholders, revised the Health Navigator core competencies to a new set of 8 (eight) Community Health Worker core competencies. As a result, the Health Navigator registry will soon become the Community Health Worker registry. If you are listed in the Colorado Health Navigator Registry, you will remain listed as the registry is updated to become a Community Health Worker registry. You may see some changes to the language used in the registry as we move to the umbrella term Community Health Worker. The registry may also grow larger as more Community Health Workers are added. Look for updates on [this page](#) for updates on this transition.
- 10. Are CHWs able to bill Health First Colorado (Colorado Medicaid) while working towards their certification or are they only able to bill after they are certified?**
 - a. In Colorado, Community Health Worker services will only be billable if the individual Community Health Worker who provides the service is actively enrolled with Health First Colorado. Only certified Community Health Workers are allowed to become enrolled providers.
- 11. What about those who have served as a CHW without the training? Do they get grandfathered in the registry?**
 - a. CDPHE is currently developing an alternative work experience pathway and will provide information once that is finalized. Individuals applying for the Community Health Worker credential through work experience will still need to complete and pass the Community Health Worker Assessment.
- 12. How much does the state competency assessment cost? Will there be any financial assistance available to help CHWs with the cost of the certification?**
 - a. The [current assessment](#) costs \$363. CDPHE is working with The Center for Advancing Professional Excellence (CAPE) to develop a new, written Community Health Worker competency assessment. We anticipate that the new cost for the new assessment will be lower

than the current assessment. Currently, CDPHE does not have funds to support scholarships for the Community Health Worker credential. However, please check with current [CDPHE-recognized training programs](#) to see if there is any financial assistance available for training.

13. Is there any work underway to expand where people get the CHW certification?

- a. The current pathway for the Community Health Worker credential requires completion requires completion of a CDPHE-approved Community Health Worker training program and passing a competency-based assessment. More information on each training program can be found on the [CDPHE website](#). We encourage parties to connect with the training program that fits their needs to determine factors like cost, as each program is different. Additionally, CDPHE is currently developing an alternative work experience pathway and will provide information once that is finalized. Individuals applying for the Community Health Worker credential through work experience will still need to complete and pass the Community Health Worker Assessment. We encourage parties to connect with the training program that fits their needs to determine factors like cost, as each program is different. Additionally, CDPHE is currently developing an alternative work experience pathway and will provide information once that is finalized. Individuals applying for the Community Health Worker credential through work experience will still need to complete and pass the Community Health Worker Assessment.

14. With changes to the registry being made to encompass the broader term, will the existing registry membership be upheld?

- a. Yes, the registry will transition from the Health Navigator registry to the Community Health Worker registry. If you are listed in the Colorado Health Navigator Registry, you will remain listed as the registry is updated to become a Community Health Worker registry. You may see some changes to the language used in the registry as we move to the umbrella term “community health worker”. The registry may also grow larger as more Community Health Workers are added.

15. Is joining the registry a one-time thing?

- a. Yes, once an individual completes the necessary steps to receive the Community Health Worker Credential and be placed on the Community Health Worker Registry, they will remain on the registry indefinitely.

16. Are there going to be seminars when the registry and certification program changes?

- a. CDPHE is actively managing the changes to the Community Health Worker credential, including changes to the registry and the competency assessment. As these changes become final, CDPHE will provide information on the [CDPHE website](#).

17. When will the new Community Health Worker Assessment be updated?

- a. In late 2023, CDPHE released a Request for Proposals (RFP) related to developing a new written competency-based Community Health Worker assessment. CDPHE selected The Center for Advancing Professional Excellence (CAPE) to develop a new, written Community Health Worker competency assessment. CAPE is the current assessment vendor, and CDPHE is currently in the contracting process with CAPE. Based on anticipated contracting and development timelines, the new assessment should be available in the Spring of 2025. CDPHE commits to working with CAPE to offer the Health Navigator assessment as long as needed during this period of transition.

Supervision

1. How will complaints be handled against CHWs?

- a. Health First Members have the right to file a complaint about anything. If the complaint is about the coverage or the pre-approval of services, that is an appeal and is not related to the complaint process at HCPF. Members can complain if they are unhappy with their service or

think they were treated unfairly. Members can view more information about the complaint process in [Chapter 7](#) of the Health First Colorado Member Handbook.

Provider Enrollment

- 1. Can a community health worker agency that employs CHWs enroll with Health First Colorado to provide services?**
 - a. HCPF is working to create a new provider enrollment type for CHW agencies. Updates will be shared via the mailing list once additional information and details are available.
- 2. We run a small non-profit, and many staff have more than one responsibility. For example, our enrollment coordinator currently does our navigation to community resources. How will HCPF handle reimbursement when qualified CHW services and unqualified services are done by one person?**
 - a. HCPF recognizes that community health workers offer a broad range of services. A CHW's scope of work may exceed what Medicaid can ultimately reimburse for. The Department anticipates that Medicaid reimbursement will be an important and stable source of funding for CHWs, but it will likely not be the sole source of funding needed to sustain and reimburse for all the important work that CHWs provide. Once HCPF has obtained CMS approval, HCPF will publish guidance on services that will be eligible for reimbursement.
- 3. Will providers have to be credentialed by the RAEs as well as HCPF?**
 - a. For Fee-For-Service reimbursement, providers will only have to be credentialed through HCPF. CHWs will need to contract with RAEs in order to receive reimbursement for care coordination-related activities.

Billing and Reimbursement

- 1. How does a CHW qualify to be able to be reimbursed for CHW services?**
 - a. For Colorado Medicaid reimbursement, an individual must meet the requirements and be on the CDPHE registry. Once a CHW meets the requirements and is on the CDPHE registry, they will need to enroll with Colorado Medicaid to receive reimbursement for CHW services provided to Health First Colorado (Colorado Medicaid) members.
- 2. What are the time limits around CHW services?**
 - a. The procedure codes used for reimbursement that are likely to be opened for the CHW benefit will have a time limit associated with them. HCPF will determine limits and additional information will be available in the coming months.
- 4. Will the fee schedule include reimbursement for FQHCs and RHCs?**
 - a. The Department is collaborating with Colorado Community Health Network (CCHN) and Colorado Rural Health Center (CRHC) to see what makes the most sense for these provider types. HCPF will publish guidance for FQHCs and RHCs once it's available.
- 5. What codes are going to be available to bill for reimbursement of CHW services?**
 - a. Other state Medicaid programs have defined CHW services under three umbrellas: health promotion and coaching, health education and training, and health system navigation and resource coordination. HCPF is working with CMS to define CHW services and will publish definitions as soon as they are approved by CMS. It is likely that the codes that become available to CHWs will fall under those categories. The Department is exploring the Self-Management Education codes (CPTs 98960-98962) as potential options. These codes would be used to report educational and training services to an individual or group of patients for the purpose of teaching the patients (or caregivers) how to self-manage their condition or disorder. These CPT codes are not active under HCPF's fee schedule and should not be used for reimbursement purposes until the benefit is active. HCPF is also exploring the new Medicare codes related to CHW services.

- 6. How does the CHW benefit and reimbursement impact CHW programs who are grant funded programs and how do they start billing Health First Colorado (Colorado Medicaid)?**
 - a. HCPF recognizes that CHWs and their scope of work are broad, and it is likely that Medicaid will not be able to cover everything that CHWs do. CHWs who are grant funded will likely see that this will be a consistent funding source. HCPF anticipates that CHWs and CHW agencies will still use their other funding sources to help sustain the full scope of CHW work. Information on how to start billing Health First Colorado will be released in the coming months.
- 7. CMS has new billing codes as of January 2024 for CHWs that are called Community Health Integration (CHI) services. How will these new codes be parallel to the self-management education codes?**
 - a. HCPF is aware that CMS has published new codes that are related to Community Health Integration services (G0019 & G0022). If you are a Medicare provider, these codes are available for Medicare and dually eligible patients. These codes will not work in reimbursement for services being provided to Medicaid-only members. We are looking into the potential to align with Medicare and offer these codes to providers along with the self-management education codes (98960-98962). Additional guidance on billing will become available in the coming months.
- 8. Are CHW services allowed to be provided via telemedicine?**
 - a. HCPF will work towards opening CHW codes and services that are appropriate to be rendered via telemedicine. Additional guidance will be released closer to the benefit going live.

Documentation and Referrals

Guidance on documentation and referrals will be released closer to the benefit going live (July 2025).

Miscellaneous Questions

- 1. I was not able to attend the stakeholder meetings that HCPF hosted in January and February, but I have comments and suggestions for benefit implementation. Where can I submit my comments?**
 - a. Please email HCPF_CHW_Benefit@state.co.us to submit any comments or suggestions regarding the implementation of the new CHW benefit.

- 2. How are organizations being informed about the opportunity for them to tap into these community health workers that are already available? What is engagement going to look like to ensure that organizations are aware of this opportunity?**

CDPHE facilitates a quarterly Community of Practice for Community Health Workers (CHW). If you are a CHW, Health Navigator, Patient Navigator, Promotoras de salud, or similar role you are invited to join a network of CHWs from all over Colorado, to share best practices and identify training opportunities that fit your needs. The Community of Practice will be designed for Community Health Workers from all over Colorado who are working in health or community-based settings to learn from one another, share resources, and best practices and provide you the opportunity to explore new training opportunities in your roles. In addition, CDPHE is providing the opportunity to learn more about diabetes and cardiovascular prevention and management and how you can incorporate programs such as National DPP and DSMES into your communities. The Community of Practice will convene on a quarterly basis and the audience is a CHW or similar role in practice or individuals interested in being a CHW. If you are a CHW or similar role, please consider allowing your CHWs to learn from other CHWs across the state. The next CHW Community of Practice meetings will take place in May, August, and November. Please register at [Colorado CHW Community of Practice](#). If you have any questions, please contact Yvette Camarena at Yvette.camarena@state.co.us.

If you are interested in receiving Colorado Medicaid-specific information and updates regarding the upcoming implementation of the new CHW benefit, please fill out this form to be placed on the HCPF [email list](#). Updates regarding the CHW benefit will be sent out on an as needed basis. If you have any questions regarding CHW reimbursement, please contact HCPF_CHW_Benefit@state.co.us.

Revision History

Version	Date	Reason for Revision	Section
1.0	6/11/2024	New Document	All
1.1	6/12/2024	Updates to case management question	Services, Qualifying Conditions, and Medical Necessity