



Eligibility & Benefit Expansions 2018-2025

January 2026

During HCPF's Joint Budget Committee Briefing in late december, JBC members asked for information about how the General ASsembly has expanded Medicaid eligibility and benefits over the last few years. HCPF's response is below.

Overview

Over the last seven legislative sessions (2018-2025), the General Assembly has enacted more than 50 bills expanding eligibility for Health First Colorado (Medicaid) and Child Health Plan Plus (CHP+), broadening covered benefits, and reducing barriers to care. These expansions fall into several major categories:

- **Eligibility expansions** include extended postpartum coverage (12 months), reproductive health coverage for immigrants, family planning for individuals over-income for Medicaid, coverage of health services for incarcerated individuals prior to release, Medicaid buy-in options for individuals with disabilities, the "Cover All Coloradans" initiative, and CHP+ expansion to 260% FPL.
- **Behavioral health transformation** encompasses many bills creating a statewide behavioral health system, the Behavioral Health Administration, expanded crisis services, peer supports, mobile crisis response, substance use disorder treatment, and Certified Community Behavioral Health Clinics (CCBHCS).
- **Maternal and reproductive health** includes doula services, choline supplements, family planning expansion, and supports for high-risk pregnancies.
- **Reduced barriers to care** includes removal of prior authorization for psychotherapy and equipment repairs, elimination of pharmacy and outpatient copays, step therapy exceptions, and coverage of clinical trial costs.

Year by Year Highlights

- **2018-2019:** The General Assembly laid groundwork for behavioral health transformation with the Behavioral Health Care Coverage Modernization Act



(HB19-1269) and Child and Youth Behavioral Health System Enhancements (SB19-195), which added wraparound services to prevent out-of-home placements. Coverage for SUD residential and inpatient services was established (HB18-1136).

- **2020:** SB20-007 required a statewide community behavioral health care system within managed care. SB20-033 authorized Medicaid buy-in coverage after age 65 for individuals with disabilities. Medicaid began covering routine costs for clinical trial participation (HB20-1232).
- **2021:** The 2021 session produced significant expansions. SB21-194 extended postpartum coverage from 60 days to 12 months for both Medicaid and CHP+. New programs were created for reproductive health care (SB21-009) and family planning up to 260% FPL (SB21-025). The Behavioral Health Administration was established (HB21-1097). New covered benefits included secure transport (HB21-1085), peer supports (HB21-1021), and clinical pharmacy services (HB21-1275).
- **2022:** HB22-1289 ("Cover All Coloradans") expanded coverage to qualifying children and pregnant women regardless of immigration status. SB22-052 raised the CHP+ income limit to 260% FPL. Behavioral health expansion continued with mobile crisis response (HB22-1214), mental health residential homes (HB22-1303), supportive housing (SB22-131), and Colorado's Behavioral Health Safety Net (HB22-1278). Prior authorization was removed for psychotherapy (SB22-156) and complex rehabilitation technology repairs (HB22-1290). Criminal justice re-entry services expanded (SB22-196). New benefits included equine therapy (HB22-1068).
- **2023:** New covered benefits included doula services (SB23-288) and community health worker services (SB23-002). HB23-1183 required step therapy exceptions for serious conditions, and HB23-1130 mandated timely review of FDA-approved drugs for serious mental illness.
- **2024:** HB24-1322 authorized coverage of housing and nutrition supports and expanded coverage for incarcerated individuals prior to release through an 1115 waiver. SUD treatment was further expanded and standardized (HB24-1045). High-acuity crisis services for children and youth were established (HB24-1038). Continuous glucose monitor coverage was aligned with Medicare criteria and extended to gestational diabetes (SB24-168). Choline supplements for pregnant people became covered under both programs (SB24-175). Antipsychotic medication access improved through preferred drug list exceptions (SB24-110). LTSS added presumptive eligibility (HB24-1229).
- **2025:** SB25-042 expanded inpatient mental health services through an 1115 waiver. Coverage was added for abortion care using state-only funds (SB25-183) and breast cancer examinations (SB25-296). LTSS waiver consolidation merged the CHCBS and

CLLI waivers for children with complex health needs (HB25-1003), and the CIHS waiver was extended to 2030 (SB25-226).

Comprehensive Legislative Reference

Program Key: M = Medicaid only | C = CHP+ only | B = Both programs

Year	Bill	Description	Program
2018	HB18-1136	Covered SUD residential and inpatient services	M
2019	HB19-1193	Behavioral health supports for high-risk pregnant and parenting women	M
2019	HB19-1269	Behavioral Health Care Coverage Modernization Act	M
2019	SB19-195	Child and Youth Behavioral Health System Enhancements; added wraparound services to CHRP waiver	M
2019	SB19-222	Improving access to behavioral health for individuals at risk of entering criminal/juvenile justice system	M
2020	HB20-1232	Coverage of routine costs for participating in clinical trials	M
2020	SB20-007	Required statewide community behavioral health care system within managed care	M
2020	SB20-033	Authorized Medicaid buy-in coverage after age 65 for individuals with disabilities	M

2021	HB21-1021	Established peer supports as a covered benefit	M
2021	HB21-1085	Secure transport benefit	M
2021	HB21-1097	Created the Behavioral Health Administration	M
2021	HB21-1275	Reimbursement for clinical pharmacy services	M
2021	SB21-009	Reproductive health care program for individuals ineligible for Medicaid due to immigration/citizenship status	M
2021	SB21-025	Expanded family planning coverage to individuals up to 260% FPL	M
2021	SB21-139	Reimbursement for dental services delivered via telemedicine	B
2021	SB21-194	Extended postpartum coverage from 60 days to 12 months	B
2022	HB22-1068	Medicaid reimbursement for equine therapy	M
2022	HB22-1214	Mobile crisis response services	M
2022	HB22-1278	Colorado's Behavioral Health Safety Net	M
2022	HB22-1289	Cover All Coloradans—expanded eligibility regardless of immigration status	B

2022	HB22-1290	Removed prior authorization for repairs to complex rehabilitation technology	M
2022	HB22-1302	Integrated care grants and sustainable funding	M
2022	HB22-1303	Expansion of mental health residential homes	M
2022	SB22-052	Expanded CHP+ eligibility to 260% FPL (from 250%)	C
2022	SB22-131	Supportive housing as a covered benefit	M
2022	SB22-156	Removed prior authorization for psychotherapy services	M
2022	SB22-196	Criminal justice re-entry service expansion; standardized SUD treatment	B
2023	HB23-1130	Required timely review of new FDA-approved drugs for serious mental illness	M
2023	HB23-1183	Required exceptions to step therapy for serious or complex conditions	M
2023	SB23-002	Coverage of community health worker services	M
2023	SB23-222	Removed copayments for pharmacy and outpatient services	M
2023	SB23-288	Coverage of doula services	B
2023	SB23-289	Community Medicaid Benefit / Community First Choice—new LTSS options in community settings	B

2024	HB24-1038	High-acuity crisis services for children and youth	M
2024	HB24-1045	Expanded and standardized treatment for substance use disorder	M
2024	HB24-1322	Coverage of housing and nutrition supports; coverage for incarcerated individuals prior to release (1115 waiver)	M
2024	HB24-1384	Required exploration of CCBHCs and application for CCBHC Demonstration	M
2024	SB24-110	Exceptions to preferred drug list for antipsychotic medications	M
2024	SB24-116	Discounted care for indigent patients	M
2024	SB24-168	Continuous glucose monitor coverage aligned with Medicare; includes gestational diabetes	M
2024	SB24-175	Choline supplements coverage for pregnant people	B
2025	SB25-042	Expanded inpatient mental health services through 1115 waiver	M
2025	SB25-183	Coverage of abortion care using state-only funds	B
2025	SB25-296	Coverage for breast cancer examinations	B

Office of Community Living Benefit Expansions

Long-Term Services and Supports, or LTSS, are a subset of Colorado Medicaid benefits that serve older adults and people with disabilities who need help with daily activities and/or ongoing supervision. LTSS includes both institutional care, like nursing facilities and Intermediate Care Facilities, and a broad set of home and community-based services delivered through HCBS waivers and the Community First Choice State Plan option.

Over the past five years, LTSS has expanded primarily through investments in the HCBS system, growth in waiver enrollment, and new community-based benefit options, all built incrementally through JBC and General Assembly action each fiscal year. With the Committee's support, the state has invested hundreds of millions of dollars in LTSS, particularly HCBS, increasing direct care worker wages and reducing turnover and vacancies so that more members can actually access services. Overall, LTSS costs have risen since FY 2020-21, driven by provider rate increases, increased utilization of services by members, and more people qualifying for and enrolling in LTSS. HCBS waiver enrollment continues to grow, particularly in higher-acuity waivers such as the Developmental Disabilities (DD), Children's Habilitation Residential Program (CHRP), and Brain Injury (BI) waivers, and the JBC has repeatedly authorized additional DD waiver slots to bring people off the waitlist into comprehensive community services. These expansions reflect a multi-year pattern where each year's budget decisions build on prior investments.

Colorado has also expanded how LTSS are delivered. Roughly four out of five LTSS members are now served in the community rather than in nursing homes. The new Community First Choice benefit—authorized by the General Assembly—moves core in-home supports into the State Plan with an enhanced federal match, helping sustain and in some cases expand access to personal care, homemaker, and health maintenance services. Because a small share of Medicaid members using LTSS now account for a large share of total Medicaid spending, the Department's current sustainability efforts are focused on moderating growth in specific high-cost LTSS benefits while preserving the core LTSS package and the progress we have made together with the JBC in expanding community-based services over time.

Outlined below are the key legislation and budget requests that have significantly impacted eligibility and benefit expansion in LTSS.

Legislation / Budget Action	HCBS Waiver / Population	Change Implemented
HB18-1407	DD/ Individuals with an intellectual and/or developmental disability	Increased certain HCBS I/DD waiver rates with a required pass-through to direct care workers' wages. Directed enrollment of 300 people from the DD waitlist and added requirements for emergency enrollments and reserve-capacity transitions onto the DD waiver from the wait list.
SB19-195	CHRP/ Children at risk of or in out of home placement	Add Wrap Around services to the CHRP waiver
SB19-238	All waivers/ Home Care workers	Increase the reimbursement rate for personal care and homemaker service providers
SB19-197	SCI/ Individuals with a Spinal Cord Injury	Continue the HCBS SCI waiver program through 2025
SB21-286	All HCBS	Distribution Federal Funds for Home- and Community-based Services (ARPA)
SB21-038	SCI/Individuals with a spinal cord injury	Expands this waiver statewide
SB21-039	DD, SLS, SCI, BI/ Working individuals on HCBS waivers	Elimination of sub minimum wage in Colorado - addition of buy-in program for SLS, DD, SCI, BI
SB 21-210	EBD	Adds remote supports as an option for PERS under the EBD waiver
HB22-1283	CHRP/Youth Mental Health	Provides operational support for psychiatric residential treatment facilities and qualified residential treatment programs for youth
HB22-1114	BI, CMHS, CIHS, DD, EBD, SLS, State SLS/ Non-Medical Transportation	Adds transportation network company as provider of non-medical transportation

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HB18-1407	DD/ Individuals with an intellectual and/or developmental disability	<p>Increased certain HCBS I/DD waiver rates with a required pass-through to direct care workers' wages.</p> <p>Directed enrollment of 300 people from the DD waitlist and added requirements for emergency enrollments and reserve-capacity transitions onto the DD waiver from the wait list.</p>
SB19-195	CHRP/ Children at risk of or in out of home placement	Add Wrap Around services to the CHRP waiver
HB22-1068	CES, CHRP, SLS/ Members utilizing equine therapy	Allows for Medicaid reimbursement of equine therapy through state plan
R10	All waivers/ HCBS Providers	Provider Rate Adjustments including targeted rate increases
R9	All waivers/ OCL Program Enhancements	<p>OCL program enhancement including:</p> <ul style="list-style-type: none"> • expanding Home Delivered Meals (HDM) program, • increased rate for Transitional Living Program (TLP) • align rates for the same service across waivers, • created a negotiated rate for Supported Living Program (SLP), • and maintain current funding for state funded programs for people with an IDD
SB23-289 (JBC)	Community First Choice Benefit (CFC)	Adds CFC to state plan which expands access to certain HCBS to a larger population
BA-7	Community Based Access to Care	In response to DOJ findings. Initiatives focus on providing more information to members on their options to prevent institutionalization.
R5	DD/ Developmental Disabilities Waiver	Increased funding for reserved capacity & emergency enrollments

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SB19-195	CHRP/ Children at risk of or in out of home placement	Add Wrap Around services to the CHRP waiver
R7	All waivers/ HCBS Providers	Across the board increase, HCBS direct care worker base wage, Non-Medical Transportation increase
R10	CES, CHRP/ Children with co-occurring disabilities	Expand respite services for CES and CHRP waivers to include Skilled and Therapeutic Respite
HB24-1229	Potential LTSS members	Presumptive Eligibility
R10	Members with nursing services	Implementation of third party reviews for nursing services
R6	All waivers	Provider Rate Adjustments
SB25-226	CIHS/ Members living with a primary condition resulting in total inability for independent ambulation	Extends the Complementary and Integrative Health (CIH) HCBS waiver until 2030
HB25-1003	CwCHN/ Children with complex health needs	Merge the Children's Home and Community Based Services (CHCBS) waiver with the Children with Life Limiting Illness (CLLI) waiver - expanding access to HCBS.

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SB19-195	CHRP/ Children at risk of or in out of home placement	Add Wrap Around services to the CHRP waiver
R11	CHRP, EBD, CIHS, DD, SLS/ OCL Benefits	<p>Included:</p> <ul style="list-style-type: none"> • CHRP Group Respite • Hospital Backup Unit Eligibility expansion • ACF tiered rates • CIHS Waiver extension (SB25-226) • Supported Employment pilot

For more information, contact:

Jo Donlin, HCPF Legislative Liaison, 720.610.7795, jo.donlin@state.co.us