



OPERATIONAL MEMO

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Purpose and Audience:

This memo aims to provide Colorado Benefits Management System (CBMS) eligibility workers with general information about the new High-Level Program Group (HLPG), Behavioral Health Administration Community Services, that will go live on July 1st, 2023. This memo will outline its impact on PEAK/PEAKPro and CBMS. Additionally, further information will be provided about BHA Community Services' eligibility and program benefits. Please share this memo with anyone who works with applicants seeking benefits from programs administered by the Behavioral Health Administration and the Colorado Department of Health Care Policy & Financing.

Information:

The Colorado Behavioral Health Administration administers the BHA Community Services HLPG that the Colorado Department of Human Services oversees. This new HLPG differs from other HLPGs, such as SNAP or Medical Assistance. The BHA Community Services is **not** an entitlement program. The incorporation of BHA Community Services into the PEAK application and its integration into the CBMS system is part of a larger plan put into action through the approval of House Bill 21-

1097. This legislation was created with the mission to evaluate and create a plan to improve Colorado's current behavioral health system.

Summary

CBMS users will now see an additional program group option for “Behavioral Health Admin” within the system. Eligibility for this HLPG will begin on July 1. Users will select the option when requested by an applicant. This will not make any changes to the application process, nor will it impact Medical Assistance eligibility.

What are the BHA Community Services?

BHA Community Services are community-based behavioral health programs that the Behavioral Health Administration (previously Colorado Department of Human Services - Office of Behavioral Health) has historically operated.

As one of the recommendations from the Colorado Behavioral Health Task Force in 2020, the eligibility and encounter processing for Colorado Behavioral Health Administration (BHA) programs are being added to the Colorado Benefits Management System (CBMS) and the Colorado interChange. The Colorado interChange is HCPF's Medicaid Management Information System, which is used to process claims from contracted providers. Collectively, these BHA programs will be referred to as the Behavioral Health Administration Community Services in PEAK and PEAKPro. Within CBMS, it will be listed as Behavioral Health Admin.

It is important to note that these are not new services or benefits that Coloradans have access to. Individuals will continue to access these services in the same manner that they have been. These programs operated by the BHA, along with any eligibility criteria, are not being changed as a result of this project.

What are the benefits of the BHA Community Services programs?

- The Colorado BHA provides a range of mental health and substance use programs.
 - Programs operated by the BHA are defined on the BHA website (<https://bha.colorado.gov>) and in the BHA Finance & Data Protocol #1 (a link to this document is found at <https://bha.colorado.gov/data-performance/behavioral-health-data>).
- The BHA contracts with 18 community health centers (CMHCs) for the provision of mental health treatment services to individuals and families who are low-income or not covered by insurance throughout Colorado.

- The BHA contracts with Managed Service Organizations (MSOs) to manage and monitor substance abuse treatment services for adults and adolescents who are uninsured or under-insured in seven state Sub-State Planning Areas (SSPAs).
 - Services include involuntary commitment, medication-assisted treatment, overdose prevention programs, offender treatment services, opioid treatment programs, outpatient and residential treatment services, withdrawal management services, women’s treatment services, and the community-based Circle Program.
- The BHA contracts with Administrative Services Organizations (ASOs) to provide a network of walk-in crisis centers, crisis stabilization centers, and respite and mobile services in their regions.
- The BHA contractors serving each county can be found on the map at the bottom of the page at <https://bha.colorado.gov/get-behavioral-health-help>. Further information on BHA programs can be found at <https://bha.colorado.gov/community-programs/adults>.

Who is eligible for BHA Community Services?

- Eligibility for BHA Community Services will be determined through applications submitted to CBMS.
 - Some programs included in BHA Community Services require an income limit of 300% of the Federal Poverty Level.
 - Most programs included within BHA Community Services do not have a means-tested income limit.
- Applicants will be highly encouraged to apply for both Medical Assistance and BHA Community Services using the same application, though they are not required to do so.
- Crisis services offered through the BHA are available to any individual in Colorado, regardless of residency, citizenship, or ability to pay, without having to initially be screened through the CBMS eligibility process.
- An affirmative eligibility determination is not a guarantee of service. There is no standard set of benefits that an individual has access to after being enrolled in BHA Community Services.
 - Program participation varies, and specific requirements may apply (such as priority populations, serious mental illness, serious emotional disturbance, pregnant/post-partum women with substance use issues, for example.)

Overview of impact on PEAK and PEAKPro

Behavioral Health Administration Community Services will be a new High-Level Program Group option within the PEAK and PEAKPro applications. It will not be available through the paper Single-Point Application nor the Health First Colorado paper application. BHA providers will utilize PEAKPro to help individuals seeking mental health and/or substance use disorder services fill out and submit the PEAK application. BHA Community Services will be suggested for PEAK applicants seeking Behavioral Health and Substance Abuse Services, along with Medical Assistance.

Eligibility criteria for the new BHA HPLPG Aid Codes:

- X1: Means-tested will not have an asset test. Its eligibility is modeled after MA MAGI's eligibility system process, with some exceptions.
 - Income requirement of 300% or below the Federal Poverty Level
 - No asset test requirement
 - No Citizenship requirement
 - No Colorado Residency requirement
 - No identity verification requirements
 - No age restriction requirement
- X2: Non-means tested will have minimum requirements of name, date of birth, gender, and address.
 - No income limit requirement
 - No asset test requirement
 - No Citizenship requirement
 - No Colorado Residency requirement
 - No identity verification requirements
 - No age restriction requirement

Overview of eligibility worker's responsibility

- County workers will be responsible for combination (combo) cases that include "Behavioral Health Admin" and one or more additional HPLPGs.
- County workers will have the responsibility of helping individuals apply for BHA benefits in person and over the phone.
- Cases that are BHA-only will be handled by Denver Health Colorado Medical Assistance Program (CMAP).
 - CMAP will assist BHA providers with technical questions. Members need to direct program specific questions to their BHA service provider.

What changes in CBMS should eligibility workers expect to see?

- "Behavioral Health Admin" will be added as an option for a High-Level Program Group within the Colorado Benefits Management System (CBMS).

- The Rescind / Reinstate window will be modified to allow the Behavioral Health Admin program to be rescinded.
- The Run EBDC window will be modified to add a new field, “BH Run Date”.
- Med Spans will be modified to add the new Behavioral Health Administration program in the summary and detail windows.
- The Authorization window logic will be modified not to allow users to authorize Behavioral Health Admin alone if the case has MA to be authorized or if MA is pending.
- Retro windows will be updated to allow users to request Retro months for the Behavioral Health Admin program.
 - 90-day retroactive eligibility will be available for X1 and X2 Aid Codes, but only during the initial submission of the current application. Applications will not be able to be updated requesting retroactive coverage after the initial submission has been completed. Retroactive eligibility will not be approved for any dates prior to 07/01/2023.
- A new window, “BHA Financial Eligibility,” will be added as part of wrap-up.
- Real time eligibility (RTE) will be modified to include BHA H LPG along with MA for processing Real Time Eligibility.
- Case Assignment logic will be modified to assign BHA-only applications (cases) to CMAP.
- PEAK Inbox will be modified to show Applications for Behavioral Health Admin program with a new county code, “Behavioral Health Site.”

Action To Be Taken: Eligibility Sites will be responsible for managing BHA combination (combo) cases. These are cases that include active members within the BHA H LPG and one or more other H LPGs. They will process PEAK applications that have failed RTE and reported changes from the PEAK inbox and will continue to manage the ongoing combo cases. Additionally, if an individual is seeking BHA benefits at a county office, they will help them apply for benefits. Eligibility Sites should process PEAK applications, submit directly into CBMS, or direct them to the online PEAK application, depending on that county site's capabilities.

Attachment(s):

None

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