



COLORADO

Department of Health Care
Policy & Financing

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Health First Colorado Behavioral Health Rendering Provider Oversight (RPO) Policy

Purpose of the Policy:

The Department of Health Care Policy and Financing (HCPF) has developed standards and practices to permit pre-licensed clinicians and unlicensed professionals to deliver behavioral health services to Health First Colorado (Colorado's Medicaid program) members and seek reimbursement from a Health First Colorado Regional Accountable Entity (RAE) or reimbursement from HCPF in the case of certain services covered by the 1115 Waiver. This policy promotes quality member care, while supporting efforts to expand the workforce, reduce burnout, and improve access to care.

Definition of a Rendering Provider:

Under federal Medicaid policies, pre-licensed clinicians and unlicensed professionals are not able to independently deliver Medicaid reimbursable behavioral health services because they do not hold a valid active license in Colorado. In order to reimburse for care delivered by these individuals, their services must be billed under a Rendering Provider. **A Rendering Provider is a licensed practitioner of the healing arts (i.e. Licensed Psychologist, Licensed Behavioral Health Clinician, Physician, Osteopath, Physician Assistant, or Nurse Practitioner) with a valid active license in the State of Colorado in good standing and enrolled with Health First Colorado (Colorado's Medicaid program).** A Rendering Provider is responsible for overseeing the member's course of treatment, and this includes oversight of the behavioral health services delivered to a member by a pre-licensed clinician or unlicensed professional. The standards for Medicaid billing compliance of a Rendering Provider include:

- Ensuring that services delivered are medically necessary and appropriate for the member's diagnosis and treatment plan
- Making level of care and length of stay determinations
- Supporting transitions of care and care coordination, including connecting members to care coordination services through their RAE

The role of a Rendering Provider is to provide oversight of Medicaid billable behavioral health services delivered to members in accordance with all Medicaid rules and requirements. This oversight is narrower in scope and responsibility than clinical supervision as outlined under the Department of Regulatory Agencies (DORA) licensure requirements. While these two roles may be aligned (and may be served by the same person), the scope of



this policy is specifically limited to expectations for the oversight of Medicaid billable behavioral health services.

Definition of Pre-licensed Clinicians

Pre-licensed clinicians are individuals working towards becoming a licensed behavioral health clinician in the state of Colorado. This includes the following:

- Interns completing service hours as part of their Masters or Doctoral educational program
- Licensed Social Worker Candidate (LSW)
- Licensed Professional Counselor Candidate (LPCC)
- Clinical Social Work Candidate (SWC)
- Addiction Counselor Candidate (ADDC)
- Marriage and Family Therapist Candidate (MFTC)
- Psychologist Candidate (PSYC)

Definition of Unlicensed Professionals

Unlicensed professionals are individuals working in a professional scope of practice that is not licensed by DORA. Unlicensed professionals can range from certified professionals (including those in the process of completing certification hours) through graduate-prepared professionals and perform a range of supportive services, commensurate with their certification or degree. This includes:

- Behavioral Health Peer Support Professionals
- Qualified Behavioral Health Assistants (QBHA)
- Certified Addiction Technicians (CAT)
- Certified Addiction Specialists (CAS)
- Bachelor's level behavioral health professionals
 - Bachelor's degree in social work, counseling, psychology, or related field from an accredited institution. Providers with a bachelor's degree or higher in a non-related field may perform the functions of a bachelor's degree level staff person if they have one year in the behavioral health field.
- Master's level unlicensed behavioral health professionals
 - Master's degree in a mental health field from an accredited college or university.



Scope of the Policy:

All Medicaid enrolled providers who are responsible for the delivery of behavioral health services by pre-licensed clinicians and/or unlicensed professionals and contracted with one or more Regional Accountable Entities (RAEs), or providing certain 1115 Waiver services, must develop policies and procedures regarding Rendering Provider Oversight (RPO) of billable behavioral health services. On an annual basis, each billing provider must submit an attestation to any RAE the billing provider is contracted with, or to HCPF in the case of certain 1115 Waiver services, confirming adherence to rules and standards outlined below. Additionally, each billing provider must have written RPO policies and procedures available upon request in compliance with the minimum requirements outlined below. Requirements may also be addressed through Provider contract and/or employee handbook. Compliance will be monitored through regular audit activities.

Comprehensive Safety Net Providers (CSNPs) are required to attest and provide much of the information outlined in this policy as part of Behavioral Health Administration (BHA) credentialing. Since CSNPs are required to adopt equivalent or more rigorous policies to maintain credentialing and the BHA audits to these standards, CSNPs are exempt from submitting an attestation for this policy.

For all other Medicaid enrolled providers who are responsible for the delivery of behavioral health services by pre-licensed clinicians and/or unlicensed professionals and contracted with one or more Regional Accountable Entities (RAEs), or providing certain 1115 Waiver services, the following policies apply. Additional policies may be in place for providers delivering specific services.

General Standards for Rendering Providers to Oversee Billable Activities Delivered by Unlicensed and Pre-Licensed Professionals

- Hold a valid active license in Colorado as a licensed practitioner of the healing arts (i.e. Licensed Psychologist, Licensed Behavioral Health Clinician, Physician, Osteopath, Physician Assistant, or Nurse Practitioner).
- Have no restrictions, conditions, or stipulations from DORA (or other state licensing agency) in the last two years.
- Enrolled with Health First Colorado and serving Medicaid members.
- Completed and current Council for Affordable Quality Healthcare (CAQH) profile.
- Credentialed by the RAE or works for an institution that is credentialed at the institutional level or part of a delegated credentialing arrangement, if applicable.



Organizational Requirements for Reimbursement of Services Delivered by Unlicensed and Pre-Licensed Professionals

- Organizational, group, or individual practitioner National Provider Identifier (NPI).
- Enrolled in Health First Colorado.
- Contracted with one or more RAEs, if applicable.
- Comply with existing RAE policies regarding credentialing, if applicable.
- Comply with existing policies regarding malpractice insurance.
- Comply with the Attestation for Behavioral Health Peer Support Professional Certification Standards for Health First Colorado Billing, if applicable.

Medicaid Billing RPO Policy Requirements

- RPO time for review of services delivered, level of care evaluation and transition of care support needed for each pre-licensed clinician or unlicensed professional whose work is being submitted under the Rendering Provider, shall be appropriate for oversight with a minimum of:
 - 1 hour of RPO for every 40 hours of Medicaid billable services delivered by a pre-licensed clinician.
 - 1 hour of RPO for every 20 hours of Medicaid billable services delivered by an unlicensed professional.
- Rendering Provider shall review, provide feedback on documentation, and regularly evaluate documentation as part of oversight. Rendering providers shall co-sign documentation as required by regulation, contract or other policy guidance.
- Rendering Provider shall ensure pre-licensed clinicians and/or unlicensed professionals deliver services within their scope of practice and in accordance with [Medicaid Service Provider definitions](#).
- Access to the Rendering Provider or alternative clinical support for the pre-licensed clinician or unlicensed professional in the event of a crisis or emergency.

