



COLORADO

Department of Health Care
Policy & Financing

1570 Grant Street
Denver, CO 80203

Required Action for All Substance Use Disorder Residential, Inpatient and Withdrawal Management Providers

December 2020

Overview

On January 1, 2021, Health First Colorado, Colorado's Medicaid program, will expand its substance use disorder (SUD) benefit. Residential and inpatient treatment and withdrawal management services will be added to the Department's existing list of covered SUD services, giving members access to a full range of treatment options. Prior to January 2021, Health First Colorado members access these services with funding through the Office of Behavioral Health (OBH). This document provides guidance on what inpatient, residential and withdrawal management SUD providers need to do to facilitate a smooth transition to Medicaid reimbursement for Health First Colorado members already in treatment when the new services begin on January 1, 2021.

Authorization of Inpatient and Residential Treatment

The Regional Accountable Entities (RAEs) are responsible for authorizing inpatient and residential substance use disorder treatment stays as part of administering Health First Colorado's capitated behavioral health benefit. All services must be provided by a Medicaid enrolled provider, be determined medically necessary, and meet the American Society of Addiction Medicine (ASAM) Criteria for inpatient and residential treatment.

On January 1, 2021, there will be some Medicaid members who have been in residential, inpatient and withdrawal management SUD treatment since 2020 when the services were covered by OBH. Health First Colorado is committed to ensuring continuity of care for eligible members and providers and a smooth transition in coverage.

Checklist for Providers

First, all SUD providers that seek Medicaid reimbursement for residential, inpatient and withdrawal management SUD services from the RAE will need to:

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1. Be licensed with the Office of Behavioral Health for the specific ASAM level of care that they will render and bill to Health First Colorado. (For information about licensing, visit the [OBH Designation and Licensing web page](#).)
2. Be enrolled with Health First Colorado (For information about provider enrollment, visit the [Find Your Provider Type web page](#).)
3. Add a Specialty Provider Type based on your ASAM level of care license to your current or new Medicaid provider enrollment.
 - a. **Existing providers must submit a Provider Maintenance Request** in the Provider Web Portal. (For information, visit the [Provider Maintenance Quick Guide](#).)
 - b. New providers can add the Specialty Provider Type as part of provider enrollment.
 - c. **Providers will NOT receive Medicaid reimbursement** for residential, inpatient and withdrawal management services until the appropriate Specialty Provider Type(s) have been added to their provider record.
4. Contract with the RAE.

Second, to help facilitate ongoing provider reimbursement, promote the smooth transition of members and inform the Department and RAEs about the number and location of members currently in treatment, the Department requests providers do the following:

1. **Generate a list of Medicaid members in treatment as of December 11, 2020** [using the Department's template](#). The list must contain the following information:
 - a. Member Name
 - b. Medicaid ID
 - c. Treatment Provider (indicate whether Special Connections provider)
 - d. Date of Admission
 - e. Anticipated Date of Discharge
 - f. Contact information for provider staff person
2. Submit the above list to the Managed Service Organizations (MSOs) by **December 14, 2020**.



3. Contact a member's RAE directly as new Health First Colorado members enter treatment.
 - a. Visit the [Verifying Member Eligibility Quick Guide](#) for how to identify a member's RAE.
4. Coordinate with Health First Colorado members' RAEs to discuss treatment plans, support transitions to community-based services for appropriate members and arrange for stays that will extend beyond January 1.
5. **Beginning December 28, 2020, submit continued stay authorization requests to the RAEs** for all Health First Colorado members that will remain in SUD treatment after December 31, 2020.
 - a. **All continued stay authorization requests must be received by the RAEs by January 15, 2021** for members who began inpatient or residential SUD treatment prior to January 1, 2021. Failure to submit continued stay authorization requests by January 15, 2021 will jeopardize a provider's ability to receive reimbursement back to January 1, 2021 for eligible members.

Providers must be enrolled with Colorado Medicaid with the appropriate Specialty Provider Type in order to be eligible for reimbursement from the RAEs for services provided to Health First Colorado members. RAEs will establish single case agreements with inpatient, residential, and withdrawal management SUD providers not contracted with a RAE for any members that initiated treatment prior to January 1, 2021.

Regional Accountable Entity Responsibilities

The RAEs will support a smooth transition in member care and provider reimbursement in the following ways.

1. The RAEs have initiated contracting negotiations with a number of inpatient, residential and withdrawal management providers.
2. After December 18, 2020 when the RAEs receive the list of members in their region who were in treatment as of December 11, the RAEs will reach out to providers to coordinate care, discuss treatment plans, and arrange for stays that will extend beyond December 31, 2020.
3. RAEs will educate providers on their utilization management policies and procedures.
4. RAEs will educate providers on how to submit continued stay authorization requests that should be submitted beginning December 28, 2020.



5. RAEs will establish single case agreements with SUD providers enrolled with the Specialty Provider Type associated with their ASAM Level but not yet contracted for inpatient, residential and withdrawal management with a RAE for any members that initiated treatment prior to January 1, 2021.
6. When reviewing continued stay authorization requests for members who initiated treatment prior to January 1, 2021, RAEs will provide reimbursement back to January 1, 2021 for services determined medically necessary and meeting ASAM level of care criteria. All continued stay authorization requests must be received by the RAE by January 15, 2021 for these members.
 - a. To ensure continuity of care during the transition, the RAEs will authorize a Health First Colorado member's current course of treatment with a Medicaid-enrolled provider through January 5, 2021.
 - b. Beginning January 6, 2021, any continued stay for inpatient and residential treatment must be authorized by the member's RAE.
7. RAEs will work with providers to transition members to an appropriate outpatient level of care when inpatient/residential medical necessity is not demonstrated and continued stay authorization requests are denied by the RAE.

Summary of Key Dates

December 14, 2020	SUD inpatient, residential, and withdrawal management treatment Providers submit to the MSOs a list of Medicaid members in treatment as of December 11, 2020 to facilitate transition in payment and member management to the RAEs.
December 31, 2020	Last day of OBH funding for inpatient, residential and withdrawal management SUD services for Health First Colorado members
January 1, 2021	Medicaid coverage of inpatient, residential and withdrawal management SUD services begins
January 6, 2021	Ongoing provider reimbursement dependent on RAE continued stay authorization
January 15, 2021	Last day for providers to submit continued stay authorization requests to the RAEs for members that were in inpatient, residential or withdrawal management treatment prior to January 1, 2021



Additional Resources

Below are links to additional resources regarding Health First Colorado's new inpatient and residential SUD services.

- [SUD Residential Provider Manual](#)
- www.colorado.gov/hcpf/ensuring-full-continuum-sud-benefits

For more information contact

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