

Emergency Rule: Pediatric Behavioral Therapy (PBT) Providers

Children's Disability Advisory Committee Meeting

October 8, 2025

Commitment to Stakeholders

HCPF will:

- Thoroughly and thoughtfully evaluate all questions and feedback.
- Identify what feedback can be incorporated now or potentially in the future.
- Transparently communicate the outcomes of feedback and questions.
- Refer individuals to appropriate HCPF resources for out-of-scope topics.

Background on Pediatric Behavioral Therapy (PBT) Providers

History of PBT and Health First Colorado

- **2012-** The “Children with Autism” waiver in Colorado was established by Senate Bill 12-159, offering Applied Behavior Analysis (ABA) to members
- **Sept 14, 2015-** The federal Centers for Medicare & Medicaid Services (CMS) denied the Children with Autism Waiver, indicating that those services should be covered in the Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) program
- **April 2016-** Prior authorizations for PBT under EPSDT started
- **September 2025-** HCPF identifies the need to shift PBT to a defined benefit, moving it out from EPSDT

Goals for Proposed Changes

- Create a defined benefit for Pediatric Behavioral Therapies outside of EPSDT
- Develop rules that are explicit and clear for the providers offering these important services
 - Clarify enrollment and certification requirements
 - Address billing discrepancies
 - Help ensure consistency and quality

Goals for Proposed Changes Cont.

- Ensure that PBT is a safe and reliable resource for Health First Colorado families
- Avoid unintended consequences that put this critical resource at risk
 - Recent audit findings identified improper payments and discrepancies in billing that we need to address

Proposed Changes to Pediatric Behavioral Therapy (PBT) Provider Rules

Changes to PBT Provider Policies

- Create a separate defined benefit for Pediatric Behavioral Therapies (PBT)
 - Maintaining current certifications and requirements outlined for providers under the previous policy

Changes to PBT Provider Policies

- HCPF will follow an emergency rulemaking timeline for the initial creation of the PBT defined benefit
 - Recent legal questions have created an opportunity to put stronger protections and clearer rules in place
- Further development of the PBT defined benefit will occur in the future and will include additional opportunities for input from stakeholders

Impact of Rule on Providers

- **No new requirements for providers**
 - Providers will be required to maintain the same certifications and requirements that are in the current policy memo and billing manual
 - The proposed rule consolidates existing requirements allowing providers to locate all of the information in one place
- Providers should expect that how the requirements are enforced will change over time as needed

Impact of Changes on Health First Colorado Families

- Families will retain the same access to Pediatric Behavioral Therapies under the proposed rule. There are no new limitations on the care members can receive.
- Families who have questions about ongoing services can reach out to their providers for updates.

Timeline of Proposed Changes

- **October 10, 2025:** Initial reading of emergency rule at [Medical Services Board \(MSB\) meeting](#)
- **October 10, 2025:** Effective date of emergency rule
 - Pending MSB approval
- **December 12, 2025:** Final reading of emergency rule at MSB

Next Steps

- Emergency rulemaking process to create a separate defined benefit for Pediatric Behavioral Therapies
- Additional input opportunities will be offered as development of the policy continues
 - Anticipate future stakeholder meetings



Questions?



Contact Information

Website: Emergency Rule: Pediatric Behavioral Therapy (PBT) Providers Stakeholder Meeting Webpage

Sign up for our updates

Billing questions: Regional Field Representatives

Policy questions: gina.robinson@state.co.us

Thank you!