

Colorado Consortium for Prescription Drug Abuse Prevention

Substance Disorder Treatment in Colorado – State of the State

July 10, 2025 via Zoom

Participants: See attached listing

Treatment Work Group Co-chair, Dr. Tyler Coyle, opened the meeting and thanked the Consortium for organizing the presentation.

State of Colorado OTP Regulation and Beyond - Ryan Mueller, State Opioid Treatment Authority and Associate Director of Controlled Substance Licensing at BHA:

The presentation addressed state and federal regulatory updates, including changes that occurred over the past five years due to COVID-19's impact on medication access. Presentation summary:

The primary focus of revisions to the OTP and CSI rules was to align with 42 CFR. Part 8 changes at the Federal/SAMSHA level. BHA changes took into consideration increased access to life-saving medication, improved treatment outcomes, reduced risk to community and care, recipient harm, and stigma reduction. Some other states have interpreted the changes differently, i.e., they do not want jails to receive methadone, and they do not want increases in take-home medications. Ryan said Colorado has the ability to make decisions based on data and best practices.

BHA collaborated with OPTs and care recipients in 2024 and early 2025 to ask about rules that were and were not working for them. Consultations were held with OTP medical and administrative directors as well as the COTAD and AATOD executive team. Changes were supported by data and communicated to the State Board of Human Services for review. The final rules will be published by the Secretary of State on July 30th.

Ryan reviewed other rules, such as admission, diagnostic parameters, remission, medical referrals, gender identity, counseling requirements, toxicology screening and alternatives, take home eligibility and doses, and new harm prevention measures.

There were over 80 changes to the CSI rule volume. BHA plans to hold weekly meetings to discuss the changes and expectations. A copy of the presentation is attached to the minutes. For information about rule changes or weekly meetings: ryan.mueller@state.co.us

Behavioral Health Administrative Service Organizations (BHASOS) – Marc Condojani, BHA Adult Behavioral Health Continuum Division Director:

Marc presented a brief history of BHASOS from 2020 to the present. Crisis, substance use, and mental health providers coordinate at the community level to ensure the public accessing the behavioral health system is obtaining the level of support required. BHASOS provide navigation services to assist people and initiate care as quickly as possible. Colorado LIFTS (Linking Individuals and Families to Services) was launched in July 2025 to further streamline the network of behavioral health services. <https://bha.colorado.gov/press-release/bha-launches-colorado-lifts-increases-access-to-behavioral-health-support>

For information: marc.condojani@state.co.us

HCPF Update on SUD Treatment Services and Coverage – Jennifer Holcomb, Behavioral Health Benefits Section Manager

Jennifer opened her presentation by stating that the three new Regional Accountable Entities (RAEs) contracted with HCPF are now well aligned with the BHASOs. The presentation included the following:

SUD 1115 Waiver Renewal, including current CMS review and continued program goals.

ASAM 4th Edition Transition. For residential levels of care, HCPF is required to follow ASAM standards and is moving forward with alignment and compliance. Reimbursements rates are being revised.

Changes in SUD Provider Type and Billing. Enrollments need to be updated to include new specialties and discontinued use of 64/477.

The HCPF Medicaid Billing Manual, updated on July 1, 2025, includes a log that tracks changes made and limitations on services provided by peers outside of a team-based approach. A copy of Jennifer's presentation is attached to the minutes.

For information: jennifer.holcomb@state.co.us

Calendar of Public BHIC Hosted Events: <https://hcpf.colorado.gov/behavioral-health>

Expanding the SUD Continuum of Care Waiver: <https://hcpf.colorado.gov/1115sudwaiver>

Email: hcpf_1115waiver@state.co.us

Behavioral Health Policies, Standards, and Billing References: <https://hcpf.colorado.gov/bh-policies>

State Behavioral Health Services Billing Manual: <https://hcpf.colorado.gov/sbhs-billing-manual>

Colorado Health Institute Funding Tracker – Joe Hamel, CHI Communications Director

Joe provided an overview of the CHI interactive graphic and analysis showing where federal cuts could have the greatest impact on Colorado's state budget. The analysis is based on projections in SB 25-206, Long Appropriations Bill: <https://leg.colorado.gov/bills/sb25-206>

Federal funds make up about 30% of Colorado's budget.

CHI Federal Funding at Risk: www.Coloradohealthinstitute.org/research/federal-funding-risk

More than half of Colorado's federal funds are allocated to Medicaid medical services premiums, which the state pays healthcare providers for low-income and disabled Coloradans (\$7.9 billion). Another \$2.5 billion is allocated to other HCPF services, including behavioral health and community-based care. \$700 million of federal funding supports social programs.

Meeting participants discussed funding issues, including potential funding restrictions imposed by Colorado TABOR (Taxpayer's Bill of Rights): <https://leg.colorado.gov/agencies/legislative-council-staff/tabor>

For information: hanelj@coloradohealthinstitute.org

MOUD Treatment Protocol in Colorado – Emily Zadvorny, Pharm D, BCPS, Executive Director, Colorado Pharmacists Society:

In 2023, pharmacists were requested by the Opioid and Other Substance Use Disorders Study Committee to assist with the opioid crisis. A proposal was presented to the committee, and it was included in the opioid treatment bill in 2024 (HB24-1045). The bill gave pharmacists the authority to prescribe controlled substances, receive reimbursement for services, and be eligible for existing funding under the MAT Expansion Program. The regulatory process to implement the bill involved a review of other states' protocols, collaboration with subject matter experts, and input from COSAM and other medical societies. The final protocol became effective May 15, 2025.

Emily spoke about current issues pertaining to the cut in MAT Expansion funding and the pending DEA rule changes that have not yet been updated to allow pharmacies to obtain a DEA registration number to prescribe controlled substances. Other states are experiencing the same issue with DEA registration. A copy of the presentation is attached to the minutes.

For information: emily.zadvorny@copharm.org

Colorado Pharmacy Laws: <https://dpo.colorado.gov/Pharmacy/Laws>

HB24-1045 Treatment for Substance Use Disorders: <https://leg.colorado.gov/bills/hb24-1045>).

Discussion:

Jose Esquibel said there may be some carryover funds available for a MOUD pilot. He expressed hope that pharmacies will be able to help with treatment access and will follow up with Emily. He mentioned potential funding in the Support Act that had bi-partisan support and passed to the Senate from the House.

Ryan asked about the proposed new rural hospital fund and related OTP care.

Jennifer said that they are still waiting for a CMS response related to recent legislation and what is actionable for Medicaid. She said there is nothing specific at present regarding the SUD 1115 Waiver.

Kristin Carpenter asked about long-term patient residency in an RCO and whether or not the stay affects the patient's county of residence. Jen Place said she would refer this question to the Recovery Work Group.

Adjournment: The meeting adjourned at 11:30 a.m.

Attachments: Participant List, Presentations: State of Colorado OTP Regulation and Beyond; HCPF Update on SUD Treatment Services and Coverage; MOUD Treatment Protocol in Colorado