

News & Updates

Behavioral Health Overpayments & Recoveries Update

As a result of our [December 2021 listening sessions](#) with behavioral health providers, Colorado Community Health Alliance (CCHA) temporarily paused all overpayments and recoveries while we reviewed and analyzed our processes.

Background

As fiscal stewards of state and federal funds, Medicaid managed care entities (MCEs) like CCHA are charged with complying with any state and federal regulations regarding Medicaid payments. Medicaid MCEs are subject to recovering any known overpayments regardless of error or fault as outlined in CRS 25.5-4-301, the Patient Protection and Affordable Care Act, and the False Claims Act. Medicaid is federally dictated to be the payor of last resort and can only pay after any and all applicable commercial and Medicare coverage is applied to a service.

Action we have taken

- Reviewed and analyzed our overpayment and recoupment processes.
- Changed the lookback period for recoupments reviewed for dates of service after January 1, 2022. See the [February 2022 CCHA Monthly Newsletter](#) for more information.
- Developed the [Overpayment Recovery Process Overview](#) to help address many of the questions providers asked during our listening sessions.

What you need to know

All recoupments temporarily paused will be restarted on or around June 15, 2022.

Dates of service prior to 2022

For recoupments on claims with dates of service prior to 2022, previous lookback periods of 12 months to 3 years will apply. If a provider has already received their final recoupment notification when the pause was put into effect, the CCHA Behavioral Health Provider Experience team will contact the provider to ensure they are aware the recoupment process will be restarted. Providers will also be able to request a copy of the final recoupment notification from their representative, if needed.

Dates of service after 2022

For recoupments on claims with dates of service on or after January 1, 2022, the lookback period is 365 days/12 months from the date the claim was paid. The initial notice of recoupment will occur within the 12-month lookback period. Providers will continue to receive an initial and final notice before any recoupments take place. See the [February 2022 CCHA Monthly Newsletter](#) for exceptions and more information.

Reminder: For dates of services **before** January 1, 2022, CCHA will continue to **not** recoup payments for claims missing the NPI Requirement for Rendering Providers, commonly referred to as box 24J. This announcement was made in December 2021.

For dates of service **on or after** January 1, 2022, claims missing the required NPI Requirement for Rendering Providers, **may be subject to recoupment** as part of our normal recovery process to ensure CCHA is compliant with state requirements. See our guide on [how to submit a claim via Availity](#).

Do you have questions or need support?

Contact your [CCHA Behavioral Health Provider Experience representative](#).

CCHAcared.com



If you need the information on this page in another format, please contact [CCHA Member Support Services](#). The information will be provided in paper form free of charge within 5 business days.

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