



**COLORADO**

Department of  
Regulatory Agencies

Division of Insurance

# Aligned Core Competencies Comment Form - Colorado Insurance Regulation 4-2- 96

Please complete this form to provide comments/feedback to the Colorado Division of Insurance related to the **aligned core competency** requirements for alternative payment models (APMs) for primary care services included in [Colorado Insurance Regulation 4-2-96](#) (specific competencies are listed in Appendix B) . Per the regulation, carriers offering individual, small group, or large group health benefit plans in Colorado on or after January 1, 2025, are generally required to:

1. Incorporate the aligned core competencies into the care delivery expectations used in primary care APMs;
2. Ensure payments to support, incentivize, or reward provider performance of the competencies are meaningful, and that the level and type of financial incentives are determined in mutual agreement with the provider to align with patient needs and practice priorities; and
3. Ensure additional care delivery expectations, in addition to the aligned core competencies, are included at the mutual agreement of the carrier and provider, are not redundant with the aligned core competencies, and are based on a provider's patient panel needs and practice priorities.

Please submit this completed form **no later than October 7, 2025**. *Note:* This form is specific to aligned core competencies - if you would like to provide comments on the other APM parameters included in Regulation 4-2-96 (patient attribution, risk adjustment, or aligned quality measures), those comment forms can be accessed on the Division's [HB22-1325 - Primary Care Alternative Payment Models](#) website.

**In addition**, the Division will be hosting a stakeholder meeting **on October 9, 2025, from 10-11 am MT**, to obtain stakeholder feedback on patient attribution and the other APM parameters set forth in [Regulation 4-2-96](#). Registration for this meeting is available at the following link:

- <https://us06web.zoom.us/meeting/register/SWxWqpArQyqhHhByYe29og>



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1. What changes, if any, did you notice in relation to the implementation of the aligned core competency requirements included in Regulation 4-2-96?
  
2. Would you classify these changes as overall positive or negative, and why?
  
3. What changes, if any, would you suggest to **existing** requirements related to aligned core competencies in primary care APMs?
  
4. What **new** requirements, if any, should the Division consider in relation to aligned core competencies in primary care APMs?
  
5. Please provide any additional thoughts/comments related to aligned core competencies in primary care APMs that the Division should take into consideration.

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