

December 20, 2016

Blythe Fitzharris
Adult System of Care Administrator
Mercy Maricopa Integrated Care
4350 East Cotton Center Blvd., Bldg. D
Phoenix, Arizona 85040

REA: Notice to Cure *Arnold v. Sarn* Fidelity Reporting_ Action Plan Acceptance

Dear Ms. Fitzharris:

The Arizona Health Care Cost Containment System Division of Health Care Management (hereinafter "AHCCCS") is writing Mercy Maricopa Integrated Care (hereinafter "Mercy Maricopa") regarding receipt of the *Arnold v. Sarn* Fidelity Requirements Action Plan and Notice to Cure Response letter as submitted by Mercy Maricopa on October 19, 2016.

The Fidelity Requirements Action Plan is **approved contingent** upon completion of the following required changes as specified below:

- **Action Plan Reporting Template**
AHCCCS is requiring that Mercy Maricopa adds an additional column to the reporting template that identifies the staff person responsible for completing the required action. The revised action plan is required for submission by close of business on or before December 27, 2016 to Kelli Donley Williams at Kelli.Donley@azahcccs.gov with a copy submission to Ena Binns at Ena.Binns@azahcccs.gov.

Mercy Maricopa's Notice to Cure Response letter included inquiries regarding Mercy Maricopa's contractual responsibilities for *Arnold v. Sarn* Fidelity reporting. AHCCCS reviewed the response and provided additional clarification below:

- Mercy Maricopa identified the service capacity increases that were met as requirements of the Exit Agreement.
 - AHCCCS is in agreement that capacity increases have been met by Mercy Maricopa.
- Mercy Maricopa inquired if the 80% fidelity measure is for specific criteria or the overall performance measure as used by SAMHSA.
 - AHCCCS is confirming that the 80% fidelity measure is applicable to all areas of overall performance of the four service areas. AHCCCS will continue to collaborate with and support Mercy Maricopa's efforts in facilitating technical assistance with providers to raise the average score across all four service capacity areas to at least 80%.

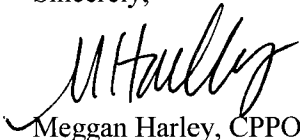
Additionally, during a technical assistance meeting with AHCCCS on October 17, 2016, Mercy Maricopa discussed concerns regarding utilization of claim reports to garner accurate reporting data from providers. Self-reporting from providers alone is **insufficient**. If billing data is unavailable, AHCCCS encourages Mercy Maricopa to identify other mechanisms of gathering such information in order to provide accurate reporting data.

Please note that while AHCCCS identified areas for improvements regarding fidelity reporting; AHCCCS does acknowledge the work implemented by Mercy Maricopa and the considerable efforts toward ensuring services provided are to fidelity.

AHCCCS will monitor monthly reporting for resolution of issues and fidelity compliance. Mercy Maricopa is required to submit the monthly reports to Kelli Donley at Kelli.Donley@azahcccs.gov with a copy submission to Ena Binns at Ena.Binns@azahcccs.gov.

Should Mercy Maricopa have any questions, please contact Kelli Donley at the above referenced email or 602.364.4651.

Sincerely,



Meggan Harley, CPPO, MSW
Chief Procurement Officer

- Cc: Eddy Broadway, Mercy Maricopa Integrated Care
Angelo Edge, Mercy Maricopa Integrated Care
Tad Gary, Mercy Maricopa Integrated Care
Debra Harris, Mercy Maricopa Integrated Care
Bernadette Moreno, Mercy Maricopa Integrated Care
Carissa Townsend, Mercy Maricopa Integrated Care
Virginia Rountree, AHCCCS
Paul Galdys, AHCCCS
Kari Price, AHCCCS
Kelli Donley, AHCCCS
Christina Quast, AHCCCS
Ena Binns, AHCCCS