Arizona Health Care Cost Containment System

Contract Year Ending 2020
External Quality Review Annual Report

for

Arizona Long Term Care System

July 2021

HSAG HEALTH SERVICES ADVISORY GROUP

HSAG HEALTH SERVICES ADVISORY GROUP

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1. Executive Summary

Overview of the Contract Year Ending (CYE) 2020 External Review

The Code of Federal Regulations (CFR) at 42 CFR §438.364 [1-1] requires that states use an external quality review organization (EQRO) to prepare an annual technical report that describes how data from activities conducted for Medicaid managed care organizations (MCOs), in accordance with the CFR, were aggregated and analyzed. The annual technical report draws conclusions about the quality and timeliness of, and access to healthcare services that MCOs provide.

According to 42 CFR, Part 438 Subpart E, External Quality Review, §438.358(b) and (c), the four mandatory activities for each MCO, prepaid inpatient health plan (PIHP), and prepaid ambulatory health plan (PAHP) are:

- Validation of performance measures (PMs) required in accordance with §438.330(b)(2).
- Validation of performance improvement projects (PIPs).
- A review conducted within the previous three-year period to determine the MCO's, PIHP's, or PAHP's compliance with the standards set forth in Subpart D of §438.
- Validation of network adequacy to comply with requirements set forth in §438.68.

For contracts effective on or after July 1, 2018, and no later than one year from the issuance of the revised external quality review (EQR) protocol, according to requirements set forth in §438.68, the Centers for Medicare & Medicaid Services (CMS) has established validation of MCO, PIHP, and PAHP network adequacy as a mandatory activity.

In accordance with the 42 CFR §438.358(a), the following entities may perform both mandatory and optional EQR-related activities: the state; its agent that is not an MCO, PIHP, PAHP, or primary care case management (PCCM) entity (described in §438.310[c][2]); or an EQRO.

As permitted by CMS and incorporated under federal regulation at 42 CFR Part 438, Arizona Health Care Cost Containment System (AHCCCS) elected to retain responsibility for performing the four EQR mandatory activities described in 42 CFR §438.358 (b). AHCCCS prepared Contractor-specific reports of findings related to each of the activities, and, as applicable, required Contractors to prepare and submit their proposed corrective action plans (CAPs) to AHCCCS for review and approval.

AHCCCS contracted with Health Services Advisory Group, Inc. (HSAG), as its CMS-required EQRO to prepare this annual EQR technical report. This report presents AHCCCS' findings from conducting each activity as well as HSAG's analysis and assessment of the reported results for each Contractor's performance and, as applicable, recommendations to improve Contractors' performance.

[1-1] Department of Health and Human Services, Centers for Medicare & Medicaid Services. *Federal Register* Vol. 81, No. 88/Friday, May 6, 2016, Rules and Regulations, p. 27886. 42 CFR §438.364 Medicaid Program; External Quality Review, Final Rule.

HSAG is an EQRO that meets the competence and independence requirements set forth in 42 CFR §438.354. HSAG has extensive experience and expertise in both conducting the mandatory activities and in analyzing information obtained from AHCCCS' reviews of the activities. Accordingly, HSAG uses the information and data to draw conclusions and make recommendations about the quality and timeliness of, and access to care and services that AHCCCS' Contractors provide.

To meet the requirements set forth in 42 CFR §438.364, as the EQRO, HSAG used information obtained from AHCCCS to prepare and provide a detailed annual technical report. The report summarizes findings on the quality and timeliness of, and access to healthcare services, and includes the following:

- A description of the manner in which the data from all activities conducted were aggregated and analyzed.
- For each EQR-related activity conducted:
  - Objectives.
  - Technical method of data collection and analysis.
  - Description of the data obtained.
  - Conclusions drawn from the data.
- An assessment of each Contractor's strengths and weaknesses.
- Recommendations for improving the quality of care (QOC) furnished by each Contractor including how the State can target goals and objectives in the quality strategy, under 42 CFR §438.340, to better support improvement in the quality and timeliness of, and access to healthcare services furnished to Medicaid members.
- Methodologically appropriate comparative information about all Contractors (described in §438.310[c][2]), consistent with guidance included in the EQR protocols.
- An assessment of the degree to which each Contractor has effectively addressed the recommendations for quality improvement made by the EQRO during the previous year's EQR.

HSAG has prepared the annual technical report for AHCCCS for 17 consecutive years. The report complies with all requirements set forth at 42 CFR §438.364.

This executive summary includes an overview of AHCCCS' EQR activities as provided to HSAG and a high-level summary of the results. The results include a description of HSAG's findings with respect to performance by the AHCCCS Contractors in complying with the AHCCCS contract requirements and the applicable federal 42 CFR §438 requirements for each activity. In addition, this executive summary includes an assessment of each Contractor's strengths and weaknesses related to the quality and timeliness of, and access to healthcare services and HSAG's recommendations for improving the quality of services.

Additional sections of this annual EQR technical report include the following:

- Introduction to the Annual Technical Report: An introduction to the annual technical report, including a description of the EQR mandatory activities.

- Overview of the Arizona Health Care Cost Containment System: An overview of AHCCCS' background including the Medicaid managed care history, AHCCCS' Strategic Plan with key accomplishments for CYE 2020, AHCCCS' quality strategy, and waivers and legislative changes impacting AHCCCS' Medicaid programs.
- Quality Initiatives: An overview of AHCCCS' statewide quality initiatives across its Medicaid managed care program and those specific to the Arizona Long Term Care System (ALTCS) program for CYE 2020.
- Contractor Best and Emerging Practices: An overview of the Contractors' best and emerging practices for CYE 2020.
- Performance Measure Results: A presentation of results for AHCCCS-selected performance measures for each ALTCS elderly and physical disabilities (EPD) Contractor and the Department of Economic Security/Division of Developmental Disabilities (DES/DDD), as well as HSAG's associated findings and recommendations for CYE 2019 results.
- Performance Improvement Project Results: A presentation of results for the CYE 2019 *Developmental Screening* PIP for DES/DDD as well as an overview of the *Back to Basics* PIP that was initiated CYE 2019 for DES/DDD and the *Breast Cancer Screening* PIP that was initiated CYE 2019 for ALTCS EPD.
- Organizational Assessment and Structure Performance: A presentation of results for the Contractor-specific operational review (OR) CAP results following the CYE 2019 review and HSAG's associated findings and recommendations.
- Network Adequacy Update: A presentation of results for the network adequacy validation (NAV) and analysis conducted in 2020 and HSAG's associated findings.

Please see appendices A, B, and C for an overview of the AHCCCS methodology for performance measure, PIP, and operational review activities, including objectives, descriptions of data obtained, technical methods of data collection and analysis, scoring methodology, and corrective action statements.

Appendix D includes the NAV study methodology and ALTCS EPD Contractor results by quarter and county. Appendix E includes the complete text of AHCCCS' CYE 2020 Network Adequacy Report.

Contractors Reviewed

During the CYE 2020 review cycle, AHCCCS contracted with the Contractors[1-2] listed below to provide services to members enrolled in the AHCCCS ALTCS Medicaid managed care program. Associated abbreviations are included.

[1-2] Note: Title 42 CFR §438.2 defines "managed care organization (MCO)," in part, as "an entity that has or is seeking to qualify for a comprehensive risk contract." CMS designates all AHCCCS Contractors as MCOs. Unless citing Title 42 CFR, this report will refer to AHCCCS' MCOs as Contractors.

- Banner University Family Care – Long Term Care (BUFC – LTC)
- Mercy Care – Long Term Care (Mercy Care – LTC)
- UnitedHealthcare Community Plan – Long Term Care (UHCCP – LTC)
- Arizona DES/DDD

Findings, Conclusions, and Recommendations About the Quality and Timeliness of, and Access to Care

The following section provides a high-level summary of HSAG's findings and conclusions about the quality and timeliness of, and access to care provided to AHCCCS members.

Performance Measures

Aggregate Results for CYE 2019

For the CYE 2019 measurement period, AHCCCS collected data and reported Contractor performance for a set of performance measures.

The following tables display the performance measure rates with an established minimum performance standard (MPS). An MPS had not been established for all reported performance measure rates. Contractor-specific results for performance measures with an MPS are included in Section 6, with additional performance measures (i.e., measures without an established MPS) included in Appendix A of this report.

Throughout the report, references to "significant" changes in performance indicate statistically significant differences between performance from CYE 2018 to CYE 2019. The threshold for a significant result is traditionally reached when the *p* value is ≤0.05.

Findings

Table 1-1 and Table 1-2 present the CYE 2018 and CYE 2019 aggregate performance measure results with an MPS for the ALTCS EPD Contractors and DES/DDD. Of note, the ALTCS EPD aggregate rates include all members who met the enrollment criteria within the ALTCS EPD line of business.

The tables display the following information: CYE 2018 performance, where available; CYE 2019 performance; the relative percentage change between CYE 2018 and CYE 2019 rates, where available; the significance of the relative percentage change, where available; and the AHCCCS MPS. Performance measure rate cells shaded green indicate that aggregate performance met or exceeded the CYE 2019 MPS established by AHCCCS. Of note, measures for which lower rates suggest better performance are indicated by an asterisk (*). For these measures, rates that fall at or below the established MPS are shaded green.

Table 1-1—CYE 2018 and CYE 2019 Aggregate Performance Measure Results—ALTCS EPD Contractors

Performance Measure	CYE 2018 Performance	CYE 2019 Performance	Relative Percentage Change	Significance Level (*p* value)[1]	MPS
Behavioral Health					
Follow-Up After Hospitalization for Mental Illness					
7-Day Follow-Up—Total	34.6%	36.6%	5.9%	*p*=0.673	60.0%
30-Day Follow-Up—Total	52.4%	62.4%	19.3%	***p*=0.042**	85.0%
Preventive Screening					
Breast Cancer Screening					
Total	34.0%	36.5%	7.5%	***p*=0.049**	55.0%
Utilization					
Ambulatory Care (per 1,000 Member Months)					
*ED Visits—Total**	69.9	74.8	7.0%	—	73.0
Diabetes Short-Term Complications Admission Rate (per 100,000 Member Months)					
*Days Per 100,000 Member Months—Total**	10.9	15.4	41.3%	—	20.0
Plan All-Cause Readmissions[2]					
*Observed Readmissions—Total**	—	11.4%	—	—	14.0%

** A lower rate indicates better performance for this measure; therefore, an increase in the rate indicates a decline in performance.*
[1] Significance levels (p values) noted in the table were calculated by HSAG on behalf of AHCCCS and demonstrate whether the differences in performance between CYE 2018 and CYE 2019 were statistically significant. The threshold for a result being considered statistically significant is traditionally reached when the p value is ≤0.05. Significance levels (p values) in bold font indicate statistically significant values.
[2] Due to changes in the technical specifications for this measure, a break in trending between CYE 2019 and prior years is recommended; therefore, prior years' rates are not displayed, and the relative percentage change is not calculated for this measure.
— Indicates that a comparison of performance between CYE 2018 and CYE 2019 was not possible or appropriate.
Cells shaded green indicate that the rate met or exceeded the CYE 2019 MPS established by AHCCCS.

Table 1-2—CYE 2018 and CYE 2019 Performance Measure Results—DES/DDD

Performance Measure	CYE 2018 Performance	CYE 2019 Performance	Relative Percentage Change	Significance Level (*p* value)[1]	MPS
Access to Care					
Annual Dental Visit					
2–20 Years	56.9%	52.7%	-7.4%	***p*<0.001**	60.0%
Children and Adolescents' Access to Primary Care Practitioners					
12–24 Months	100.0%	94.6%	-5.4%	*p*=0.158	95.0%
25 Months–6 Years	87.4%	89.1%	1.9%	***p*=0.035**	87.0%
7–11 Years	92.2%	92.6%	0.5%	*p*=0.418	90.0%
12–19 Years	89.8%	90.2%	0.4%	*p*=0.401	89.0%

Performance Measure	CYE 2018 Performance	CYE 2019 Performance	Relative Percentage Change	Significance Level (*p* value)[1]	MPS
Pediatric Health					
Adolescent Well-Care Visits					
Adolescent Well-Care Visits	45.8%	47.7%	4.2%	***p*=0.008**	41.0%
Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life					
Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life	55.2%	57.6%	4.3%	*p*=0.059	66.0%
Preventive Screening					
Breast Cancer Screening					
Total	45.1%	43.7%	-3.1%	*p*=0.533	55.0%
Cervical Cancer Screening					
Cervical Cancer Screening	16.3%	15.9%	-2.2%	*p*=0.656	30.0%
Utilization					
Ambulatory Care (per 1,000 Member Months)					
*ED Visits—Total**	44.0	43.1	-2.1%	—	43.0
Plan All-Cause Readmissions[2]					
*Observed Readmissions—Total**	—	7.4%	—	—	10.0%

** A lower rate indicates better performance for this measure; therefore, an increase in the rate indicates a decline in performance.*
[1] Significance levels (p values) noted in the table were calculated by HSAG on behalf of AHCCCS and demonstrate whether the differences in performance between CYE 2018 and CYE 2019 were statistically significant. The threshold for a result being considered statistically significant is traditionally reached when the p value is ≤0.05. Significance levels (p values) in bold font indicate statistically significant values.
[2] Due to changes in the technical specifications for this measure, a break in trending between CYE 2019 and prior years is recommended; therefore, prior years' rates are not displayed, and the relative percentage change is not calculated for this measure.
— Indicates that a comparison of performance between CYE 2018 and CYE 2019 was not possible or appropriate.
Cells shaded green indicate that the rate met or exceeded the CYE 2019 MPS established by AHCCCS.

Conclusions

Compared to the CYE 2019 MPS, the ALTCS EPD Contractors' aggregate performance in the **quality**, **access**, and **timeliness** areas indicated opportunities for improvement as both fell below the MPS.

In the **quality** area, one of two (50.0 percent) measure rates (*Breast Cancer Screening)* fell below the MPS. *Plan All-Cause Readmissions* was the only performance measure rate within the **quality** area that met or exceeded the MPS.

In the **access** area, the *Diabetes Short-Term Complications Admission Rate* measure rate met or exceeded the MPS.

Performance for DES/DDD within the **quality** area indicated opportunities for improvement, with three of five (60.0 percent) measure rates (*Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life; Breast Cancer Screening*; and *Cervical Cancer Screening*) falling below the MPS. *Adolescent Well-Care Visits* and *Plan All-Cause Readmissions* were the only performance measure rates within the **quality** area that met or exceeded the MPS for DES/DDD.

DES/DDD demonstrated positive performance in the **access** area, meeting or exceeding the MPS for three of five (60.0 percent) performance measure rates (three of four *Children and Adolescents' Access to Primary Care Practitioners* indicators).

Additionally, the ALTCS EPD Contractors' aggregate and DES/DDD's performance measure rates in the Utilization domain (*Ambulatory Care [per 1,000 Member Months]*) should be monitored for information only.

Please see Table A-1 in Appendix A for more information about the assignment of performance measures with an MPS to the Quality, Timeliness, and Access areas.

Recommendations

HSAG recommends that AHCCCS work with the ALTCS EPD Contractors to increase rates for both measure indicators in the Behavioral Health domain that failed to meet the CYE 2019 MPS. The ALTCS EPD Contractors should conduct root cause analyses for the low rates of follow-up visits after hospitalization for mental illness to determine the nature and scope of the issue (e.g., barriers to care, lack of continuity of care, transportation issues, ineffective communication). Effective transition of care programs have been shown to reduce readmissions and exacerbation of symptoms related to mental illness by engaging the patient and family members (e.g., structured discharge checklist for accountability, awareness of red flags), establishing clear transition and care plans (e.g., follow-up appointments scheduled prior to discharge), using transition coaches and providers (e.g., visits and phone calls to review illness management and questions), and ensuring effective provider communication (e.g., healthcare professionals' understanding of transition and care plan).[1-3] After the key factors related to the low rates are identified, the ALTCS EPD Contractors should work with providers and members to establish potential performance improvement strategies and solutions to increase follow-up visits and improve member transitions of care.

Additionally, HSAG recommends that AHCCCS partner with ALTCS EPD and DES/DDD to increase preventive screenings for women. To understand the cause of the low rates, ALTCS EPD and DES/DDD should examine potential barriers to women receiving breast cancer and cervical cancer screenings (e.g., provider misconceptions, lack of education, member anxiety) and implement multicomponent interventions to reduce structural barriers. Evidence suggests multicomponent interventions lead to greater effects when they combine strategies to increase community demand for, and access to, cancer screening. Interventions include increasing community demand (e.g., patient

[1-3] Viggiano T, Pincus HA, and Crystal S. Care Transition Interventions in Mental Health. *Current Opinion in Psychiatry*. Vol. 25. No. 6. Nov. 2012.

reminders; one-on-one education; and mass media such as television, radio, and newspapers), increasing access to screenings (e.g., assisting with appointment scheduling, addressing transportation barriers, offering child care), and increasing provider participation (e.g., provider incentives and provider reminders).[1-4,1-5] ALTCS EPD and DES/DDD should ensure that members receive screenings in accordance with the United States (U.S.) Preventive Services Task Force (USPSTF) screening recommendations for breast cancer and cervical cancer.[1-6,1-7]

Performance Improvement Projects

In CYE 2016 (October 1, 2015, through September 30, 2016), AHCCCS implemented the *Developmental Screening* PIP for the DES/DDD, AHCCCS Complete Care (ACC), and Comprehensive Medical and Dental Program (CMDP) populations. The CYE 2016 baseline year for this PIP was followed by an "intervention" year in which each Contractor implemented strategies and interventions to improve performance. AHCCCS conducted annual measurements to evaluate Contractor performance, with the first remeasurement reflective of CYE 2018 and the second remeasurement reflective of CYE 2019. Early identification of developmental delays is important when providing effective interventions. During well-child visits, pediatricians look for potential concerns using both developmental surveillance and discussions with parents about their concerns. If any issues are noted, pediatricians should follow through with a developmental screening. AHCCCS has approved developmental screening tools that should be used for developmental screenings by all participating primary care providers (PCPs) who care for Early and Periodic Screening, Diagnostic, and Treatment (EPSDT)-age members.

In CYE 2019 (October 1, 2018, through September 30, 2019), AHCCCS implemented the *Back to Basics* PIP for ACC/KidsCare, CMDP, and DDD populations. The CYE 2019 baseline year for this PIP will be followed by two "intervention" years in which each Contractor will implement strategies and interventions to improve performance. AHCCCS will then conduct two remeasurement periods. AHCCCS implemented the *Back to Basics* PIP because ensuring that children and adolescents receive regular well-care and dental visits is critical in disease prevention, early detection, and treatment.

In CYE 2019, AHCCCS implemented a new PIP, *Breast Cancer Screening*, for ALTCS EPD. The baseline measurement period covered CYE 2019 (data from October 1, 2018, through September 30,

[1-4] The Community Guide. *Cancer Screening: Multicomponent Interventions—Cervical Cancer*. Available at: https://www.thecommunityguide.org/findings/cancer-screening-multicomponent-interventions-cervical-cancer. Accessed on: Apr. 29, 2021.
[1-5] The Community Guide. *Cancer Screening: Multicomponent Interventions—Breast Cancer*. Available at: https://www.thecommunityguide.org/findings/cancer-screening-multicomponent-interventions-breast-cancer. Accessed on: Apr. 29, 2021.
[1-6] U.S. Preventive Services Task Force. *Breast Cancer: Screening*. Available at: https://www.uspreventiveservicestaskforce.org/uspstf/recommendation/breast-cancer-screening. Accessed on: Apr. 29, 2021.
[1-7] U.S. Preventive Services Task Force. *Cervical Cancer: Screening*. Available at: https://www.uspreventiveservicestaskforce.org/uspstf/recommendation/cervical-cancer-screening. Accessed on: Apr. 29, 2021.

2019), and will be followed by two "intervention" years and two remeasurement periods. AHCCCS implemented the *Breast Cancer Screening* PIP because of the prevalence of breast cancer among women. The purpose of the *Breast Screening* PIP is to increase the number and percentage of breast cancer screenings.

Organizational Assessment and Structure Standards

AHCCCS conducted a comprehensive OR for each ALTCS EPD Contractor during CYE 2019 and monitored the progress of all Contractors in implementing their CAPs. Overall, the strongest performance was in the Corporate Compliance (CC), General Administration (GA), and Reinsurance (RI) focus areas, wherein all ALTCS EPD Contractors demonstrated compliance (scores of 95 percent or above). Additionally, Mercy Care – LTC and UHCCP – LTC achieved full compliance (score of 100 percent) for five of the focus areas reviewed, and BUFC – LTC achieved full compliance for four focus areas. In CY 2020 AHCCCS continued to follow the ALTCS EPD CAPs. The final review and closure of these CAPS were delayed due to the COVID-19 public health emergency.

Due to the COVID-19 public health emergency, the DES/DDD OR was postponed in CYE 2020.

Network Adequacy Validation

Each quarter, each ALTCS EPD Contractor submits its contracted network and internal assessment of compliance with the applicable standards to AHCCCS. HSAG's NAV considered compliance with 12 AHCCCS-established time/distance standards for specific provider types and populations applicable to the ALTCS EPD Contractors. HSAG assembled quarterly analytic results for the July 1, 2019, through June 30, 2020,[1-8] measurement period for all beneficiary coverage areas for each ALTCS EPD Contractor.

HSAG's quarterly NAV evaluated the extent that ALTCS EPD Contractors' provider networks met AHCCCS' minimum time/distance network requirements. Each of the three ALTCS EPD Contractors met all applicable minimum network requirements for the Cardiologist, Adult; Cardiologist, Pediatric; PCP, Adult; PCP, Pediatric; and OB/GYN providers during all quarters. Data-related concerns, rather than network limitations, were identified in nearly all instances in which an ALTCS EPD Contractor failed to achieve a minimum time/distance network requirement.

In addition, AHCCCS maintains a contract with the DES/DDD to provide acute care, behavioral health, and long-term services and supports (LTSS). As of October 1, 2019, DES/DDD elected to subcontract the acute care and behavioral health services to two statewide Contractors, Mercy Care – DD [Developmental Disabilities], and UHCCP – DD. Each quarter, DES/DDD submitted its subcontractors'

[1-8] AHCCCS suspended the CYE 2020 Quarter 2 AHCCCS Contractor Operations Manual (ACOM) 436 data reporting during the COVID-19 public health emergency, and ALTCS EPD Contractors' ACOM 436 results were not available for comparison to HSAG's CYE 2020 Quarter 2 time/distance calculation results.

contracted provider network data to AHCCCS along with its internal assessment of compliance with the applicable network standards for DES/DDD beneficiaries. HSAG's NAV considered quarterly compliance with 11 AHCCCS-established time/distance standards for specific provider types and populations applicable to the ALTCS DD subcontractors for the October 1, 2019, through June 30, 2020, measurement period.[1-9]

Both ALTCS DD subcontractors met all minimum time/distance network standards during all three quarters in Cochise, Maricopa, Pima, Pinal, Santa Cruz, Yavapai, and Yuma counties. Additionally, both ALTCS DD subcontractors met the minimum time/distance network requirements in all quarters and counties for Behavioral Health Residential Facility, Hospital, and OB/GYN providers.

Refer to Appendix D for the complete study methodology and ALTCS EPD and ALTCS DD subcontractor results by quarter and county.

Overall Assessment of Progress in Meeting EQRO Recommendations

During previous years, HSAG made recommendations in the annual reports for each activity conducted. Below is a summary of the follow-up actions per activity in response to HSAG's recommendations. Some of the Contractors may have included rates in their responses to the recommendations. Please note that that these are self-reported rates and are not validated by AHCCCS or the EQRO.

ALTCS Line of Business

Table 1-3 is a summary of the follow-up actions during CYE 2020 that AHCCCS completed in response to HSAG's recommendations.

Table 1-3—HSAG Recommendations With AHCCCS Responses to HSAG Recommendations

HSAG Recommendation	AHCCCS Activities
Performance Measures	
HSAG recommended that AHCCCS work with the ALTCS EPD Contractors to increase rates for both measure indicators in the Behavioral Health domain that failed to meet the CYE 2018 performance standards.	Contractors not meeting performance standards for their CYE 2018 performance measures (child and adult) were required to submit a CAP to AHCCCS outlining identified root causes, new or enhanced interventions that will be implemented to improve the Contractors' performance, and the methods for

[1-9] AHCCCS suspended the CYE 2020 Quarter 2 ACOM 436 data reporting during the COVID-19 public health emergency, and ALTCS DD subcontractors' ACOM 436 results were not available for comparison to HSAG's CYE 2020 Quarter 2 time/distance calculation results.

HSAG Recommendation	AHCCCS Activities
	monitoring the Contractors' progress toward their performance goals.
HSAG recommends AHCCCS ensure that follow-up calls are being conducted and confirm during each call that the member has a follow-up visit scheduled with a mental health practitioner and access to necessary community resources.	Contractors not meeting performance standards for this and other CYE 2018 performance measures (child and adult) were required to submit a CAP to AHCCCS outlining identified root causes, new or enhanced interventions that will be implemented to improve the Contractors' performance, and the methods for monitoring the Contractors' progress toward their performance goals. AHCCCS monitors the implementation of Contractor-identified interventions as part of Contractor CAP update submissions.
HSAG recommends that AHCCCS conduct root cause analyses for the low rates of follow-up visits after hospitalization for mental illness to determine the nature and scope of the issue (e.g., barriers to care, lack of continuity of care, transportation issues, ineffective communication). After the key factors related to the low rates are identified, AHCCCS and the ALTCS EPD Contractors should work with providers and members to establish potential performance improvement strategies and solutions to increase follow-up visits and improve member transitions of care.	Contractors not meeting performance standards for their CYE 2018 performance measures (child and adult) were required to submit a CAP to AHCCCS outlining identified root causes, new or enhanced interventions that will be implemented to improve the Contractors' performance, and the methods for monitoring the Contractors' progress toward their performance goals.
HSAG recommends that AHCCCS work with DES/DDD to increase preventive screenings for women. To understand the cause of the low rates, AHCCCS and DES/DDD should examine potential barriers to women receiving breast cancer and cervical cancer screenings (e.g., provider misconceptions, lack of education, member anxiety) and implement multicomponent interventions to reduce structural barriers.	Contractors not meeting performance standards for their CYE 2018 performance measures (child and adult) were required to submit a CAP to AHCCCS outlining identified root causes, new or enhanced interventions that will be implemented to improve the Contractors' performance, and the methods for monitoring the Contractors' progress toward their performance goals.
HSAG recommends AHCCCS ensure that members receive screenings in accordance with the	Contractors not meeting performance standards for their CYE 2018 performance

HSAG Recommendation	AHCCCS Activities
United States Preventive Services Task Force (USPSTF) screening recommendations for breast cancer and cervical cancer.	measures (child and adult) were required to submit a CAP to AHCCCS outlining identified root causes, new or enhanced interventions that will be implemented to improve the Contractors' performance, and the methods for monitoring the Contractors' progress toward their performance goals.
HSAG recommends that AHCCCS focus efforts on identifying the factors contributing to low rates for measures and implementing improvement strategies to increase well-child visits for members 3 to 6 years of age and dental screenings.	Contractors not meeting performance standards for their CYE 2018 performance measures (child and adult) were required to submit a CAP to AHCCCS outlining identified root causes, new or enhanced interventions that will be implemented to improve the Contractors' performance, and the methods for monitoring the Contractors' progress toward their performance goals. In addition, AHCCCS implemented a *Back to Basics* PIP (baseline measurement year: CYE 2019) with the goal of demonstrating a statistically significant increase in the number and percentage of child and adolescent well-child/well-care visits, as well as a statistically significant increase in the number and percentage of children and adolescents receiving an annual dental visit, followed by sustained improvement for one consecutive year.
HSAG recommends that AHCCCS focus efforts on identifying the factors contributing to low rates for measures and implement improvement strategies to increase screenings for breast cancer and cervical cancer.	Contractors not meeting performance standards for their CYE 2018 performance measures (child and adult) were required to submit a CAP to AHCCCS outlining identified root causes, new or enhanced interventions that will be implemented to improve the Contractors' performance, and the methods for monitoring the Contractors' progress toward their performance goals.
Performance Improvement Projects	
Based on the submitted results for the *Developmental Screening* PIP, HSAG recommends that AHCCCS consider working with DES/DDD to ensure the alignment of the screening tools that	During CYE 2020, AHCCCS initiated efforts to address the noted misalignment of allowable developmental screening tools between the CMS Technical Specifications and those found in the AHCCCS Medical

HSAG Recommendation	AHCCCS Activities
are allowed by CMS and the tools recognized by AHCCCS.	Policy Manual (AMPM), Policy 430. These efforts are focused on updates to AMPM Policy 430 that will undergo review and approval through the AHCCCS Policy Committee with an associated 45-day public comment period prior to finalization.
HSAG recommends that AHCCCS use more timely data to support performance improvement activities that can be monitored in real time.	AHCCCS PIPs often use national standardized performance measures to serve as associated study indicators and the basis for performance evaluation. AHCCCS will soon transition its performance measure calculations from a CYE to a calendar year (CY) basis to better align with national standards. In addition, AHCCCS will be transitioning from AHCCCS-calculated to Contractor-calculated measures. It is anticipated that this transition will allow for more timely reporting of data; however, it is and has been AHCCCS' expectation that Contractors use internal data to monitor their performance for AHCCCS-mandated PIP indicators on a routine and ongoing basis with new and revised interventions implemented, as necessary, to promote enhanced performance. AHCCCS also requires Contractors to submit quarterly Performance Measure Monitoring Reports, which are inclusive of Contractor self-reported data and associated interventions; however, these submission requirements were suspended in CYE 2020 due to the COVID-19 public health emergency.
Operational Review	
HSAG recommends that AHCCCS consider holding technical assistance (TA) meetings with Contractors that scored lowest in the ALTCS EPD OR standards.	AHCCCS offers TA sessions for any findings in the OR that may be of concern. The MCO may request the TA session, or AHCCCS staff may offer a TA session based on the outcomes of the OR.
HSAG recommends that AHCCCS consider using the quarterly meetings with Contractors as forums in which to share lessons learned from both the State and Contractor perspectives. AHCCCS	AHCCCS has a number of venues to share lessons learned with Contractors. OR lessons learned are oftentimes discussed at each

HSAG Recommendation	AHCCCS Activities
should present identified best practices on the ALTCS EPD Contractors' predominant issues and facilitate a group discussion on Contractors' policies and procedures.	Contractor's exit interview upon completion of the on-site portion of the OR.
HSAG recommends that AHCCCS consider implementing periodic assessments of those standards for which all Contractors did not meet the 95 percent threshold and providing TA to all Contractors on identified areas of deficiency.	AHCCCS offers TA sessions based on findings of ORs as necessary. These sessions may be provided to only EPD plans, or to all plans in general, depending on what the findings may reflect. Periodic or interim ORs are always an option that AHCCCS has. However, AHCCCS would want to ensure that any policies and/or procedures found to be insufficient in the complete OR have been revised and implemented for a period of time before completing another audit.

Table 1-4 presents a summary of the follow-up actions per activity that the BUFC – LTC reported completing in response to HSAG's recommendations included in the CYE 2019 *External Quality Review Annual Report for Arizona Long Term Care System (ALTCS) Contractors*.[1-10]

The text located after each HSAG recommendation box is a summary of the content submitted by the Contractor.

Table 1-4—BUFC – LTC's Responses to HSAG's Follow-Up Recommendations

BUFC – LTC
Operational Reviews
HSAG Recommendation: Contractors should continue to conduct internal reviews of operational systems to identify barriers that affect compliance with AHCCCS standards, State rules, and federal regulations. Specifically, Contractors should cross-reference existing policies, procedures, and information distributed to providers, subcontractors, and members with AHCCCS requirements and ensure, at a minimum, alignment with both the intent and content of AHCCCS standards, State rules, and federal regulations.

[1-10] Health Services Advisory Group. *Contract Year Ending 2019 External Quality Review Annual Report for Arizona Long Term Care System (ALTCS) Contractors.* Available at: https://www.azahcccs.gov/Resources/Downloads/EQR/2019/CYE2019ExternalQualityReviewAnnualReportALTCS.pdf. Accessed on: Mar 15, 2021.

BUFC – LTC
Contractors should continue to regularly monitor and ensure that updates are made to contracts with providers and that policy manual updates from AHCCCS are also included when issued in Contractors' policies, procedures, and manuals (if impacted by the updates). Contractors should also continue to ensure that communications to all areas directly and indirectly impacted by these updates (including Contractor staff members, providers, subcontractors, and members) are provided and documented. In addition, Contractors should continue to assess current monitoring processes and activities to identify strengths and opportunities for improvement within operational processes and implement periodic assessments of those standards reviewed by AHCCCS for which Contractors are found deficient. Contractors should continue to apply lessons learned from improving performance for one category of standards to other categories.
AHCCCS conducted a CYE 2018 Operational Review of BUFC – LTC. Since that time, AHCCCS has approved the BUFC – LTC's submitted CAP. BUFC – LTC is currently submitting the Mid-Year Updates to AHCCCS for consideration of final closure of all CYE 2018 Operational Review Corrective Action Plans. The final submission is to be submitted January 2020.
Performance Measures
HSAG Recommendation: HSAG recommends that AHCCCS work with the ALTCS EPD Contractors to increase rates for both measure indicators in the Behavioral Health domain that failed to meet the CYE 2018 minimum performance standard (MPS). AHCCCS and the ALTCS EPD Contractors should conduct root cause analyses for the low rates of follow-up visits after hospitalization for mental illness to determine the nature and scope of the issue (e.g., barriers to care, lack of continuity of care, transportation issues, ineffective communication). After the key factors related to the low rates are identified, AHCCCS and the ALTCS EPD Contractors should work with providers and members to establish potential performance improvement strategies and solutions to increase follow-up visits and improve member transitions of care.
ALTCS case managers conduct a post-discharge call and assessment within 72 hours of discharge. They ensure that a follow-up visit is scheduled, and if not scheduled, offer assistance with scheduling one. Behavioral health case managers also do a follow-up call to the member to ensure an appointment has been made and offer any behavioral health-specific assistance. For those BUFC – LTC members identified as visiting an ED four or more times in a rolling six-month period, the ALTCS RN team will attempt phone contact to determine the reason for the multiple visits and assist with any care gaps they may identify. Also, the RN team will send educational letters outlining when it is appropriate for a PCP visit, Urgent Care visit, and ED visits.

Table 1-5 presents a summary of the follow-up actions per activity that the Mercy Care – LTC reported completing in response to HSAG's recommendations included in the CYE 2019 *External Quality Review Annual Report for Arizona Long Term Care System (ALTCS) Contractors*.[1-11]

The text located after each HSAG recommendation box is a summary of the content submitted by the Contractor.

Table 1-5—Mercy Care – LTC's Responses to HSAG's Follow-Up Recommendations

Mercy Care – LTC
Operational Reviews
HSAG Recommendation: Based on the results from the CYE 2019 OR, HSAG makes the following general recommendations to ALTCS EPD Contractors regarding ORs: • Contractors should continue to conduct internal reviews of operational systems to identify barriers that affect compliance with AHCCCS standards, State rules, and federal regulations. Specifically, Contractors should cross-reference existing policies, procedures, and information distributed to providers, subcontractors, and members with AHCCCS requirements and ensure, at a minimum, alignment with both the intent and content of AHCCCS standards, State rules, and federal regulations. • Contractors should continue to regularly monitor and ensure that updates are made to contracts with providers and that policy manual updates from AHCCCS are also included when issued in Contractors' policies, procedures, and manuals (if impacted by the updates). Contractors should also continue to ensure that communications to all areas directly and indirectly impacted by these updates (including Contractor staff members, providers, subcontractors, and members) are provided and documented. In addition, Contractors should continue to assess current monitoring processes and activities to identify strengths and opportunities for improvement within operational processes and implement periodic assessments of those standards reviewed by AHCCCS for which Contractors are found deficient. • Contractors should continue to apply lessons learned from improving performance for one category of standards to other categories.
Mercy Care – LTC identified five standard areas that were scored below the 95 percent threshold. Mercy Care – LTC offered the following follow-up: • Mercy Care – LTC develops, revises, executes, and maintains written policies and procedures to direct daily operations in accordance with sound business practices, applicable statutes, rules and regulations, and contract requirements. • Mercy Care – LTC department owners are responsible for conducting an annual internal review of their policies. Additionally, if a policy needs to be revised before its annual review due to

[1-11] Health Services Advisory Group. *Contract Year Ending 2019 External Quality Review Annual Report for Arizona Long Term Care System (ALTCS) Contractors.* Available at: https://www.azahcccs.gov/Resources/Downloads/EQR/2019/CYE2019ExternalQualityReviewAnnualReportALTCS.pdf. Accessed on: Mar 15, 2021.

Mercy Care – LTC
change in process, new regulations, or changes in systems, the business owner will update the policy and present it at the next policy committee review for approval.
Performance Measures
HSAG Recommendation: Mercy Care – LTC should conduct root cause analyses for the low rates of follow-up visits after hospitalization for mental illness to determine the nature and scope of the issue (e.g., barriers to care, lack of continuity of care, transportation issues, ineffective communication). After the key factors related to the low rates are identified, Mercy Care – LTC should work with providers and members to establish potential performance improvement strategies and solutions to increase follow-up visits and improve member transitions of care.
Mercy Care – LTC identified root causes of the deficiency: • Visits occurring, but the provider "type" is not that of a behavioral health provider. • Visits occurring outside of the seven-day time frame. • Visits occurring, but there were billing issues. • Visits occurring, but there was no claim. • Member/family refusal. Mercy Care – LTC established new/enhanced interventions: evidence-based practices shown to be effective in the same/similar populations. This included internal, external, member-focused, and provider-focused interventions: • Mercy Care – LTC faxes notification that the member was discharged from the hospital to the member's assigned PCP. • Referral (as needed) to a behavioral health provider after discharge. • Coordination with a behavioral health provider after discharge. • Members with high utilization may be referred to the clinical case managers as appropriate for ongoing case management. • ALTCS tracks member hospitalization twice weekly until member discharge. • Prior to member discharge, ALTCS schedules follow-up appointments for members within seven days after discharge. • The ALTCS team follows up with members to ensure scheduled appointments are kept. • Interdisciplinary team meetings are held weekly to review high-utilizing/high-need members. • The Mercy Care – LTC team meets twice weekly, and treatment and discharge planning are discussed. The Mercy Care – LTC care manager and staff members are instructed to arrange a post-discharge appointment within seven calendar days of discharge. Members have a scheduled follow-up appointment when they are discharged. • The Mercy Care – LTC care manager follows-up with the member to make sure that the member attends the appointment.

Mercy Care – LTC
• The Mercy Care – LTC medical management team works with the Mercy Care – LTC behavioral health utilization management team, and discharge coordinators, to make sure that behavioral health facilities have a follow-up appointment on their discharge plan. • The medical management team monitors post-discharge follow-up rates.

Table 1-6 presents a summary of the follow-up actions per activity that the UHCCP – LTC reported completing in response to HSAG's recommendations included in the *CYE 2019 External Quality Review Annual Report for Arizona Long Term Care System (ALTCS) Contractors* cited earlier in this report.

The text located after each HSAG recommendation box is a summary of the content submitted by the Contractor.

Table 1-6—UHCCP – LTC's Responses to HSAG's Follow-Up Recommendations

UHCCP – LTC
Operational Reviews
HSAG Recommendation: Contractors should continue to conduct internal reviews of operational systems to identify barriers that affect compliance with AHCCCS standards, State rules, and federal regulations. Specifically, Contractors should cross-reference existing policies, procedures, and information distributed to providers, subcontractors, and members with AHCCCS requirements and ensure, at a minimum, alignment with both the intent and content of AHCCCS standards, State rules, and federal regulations.
UnitedHealthcare Community Plan adopted policies on an as-needed basis and reviews said policies and procedures annually or as often as business or regulatory requirements dictate. UHCCP – LTC's policies and procedures are instrumental in translating the company's strategies, mission, and values as well as laws and regulations into documented guidelines for management and staff to follow and act upon.
HSAG Recommendation: Contractors should continue to regularly monitor and ensure that updates are made to contracts with providers and that policy manual updates from AHCCCS are also included when issued in Contractors' policies, procedures, and manuals (if impacted by the updates). Contractors should also continue to ensure that communications to all areas directly and indirectly impacted by these updates (including Contractor staff members, providers, subcontractors, and members) are provided and documented. In addition, Contractors should continue to assess current monitoring processes and activities to identify strengths and opportunities for improvement within operational processes and implement periodic assessments of those standards reviewed by AHCCCS for which Contractors are found deficient.
New and substantially revised policies and procedures for UHCCP – LTC are presented to and approved by the Policy Committee. The Policy Committee recommends approval or denial to health plan management. If approved by health plan management, the Policy Committee finalizes approval of the policy and procedure. Policies and procedures are reviewed annually or as often as business needs or regulatory requirements dictate. The Policy Committee is composed of a cross-functional

UHCCP – LTC
team designated to provide oversight and to ensure that communication to all areas directly and indirectly impacted by these updates is provided and documented. Policies are then uploaded to the UnitedHealthcare Community Plan HEART SharePoint [site], where they can be accessible.
HSAG Recommendation: Contractors should continue to apply lessons learned from improving performance for one category of standards to other categories.
UHCCP – LTC Quality Management Committee is responsible for reviewing the findings from the AHCCCS Operational Review and to oversee the internal corrective actions led by the subject matter experts to address deficiencies. Oversight includes discussion and review of best practices as noted in previous Operational Reviews as a means to correct policies, procedures, and practices to address deficient standards.
Performance Measures
HSAG Recommendation: AHCCCS should work with the ALTCS EPD Contractors to increase rates for both measure indicators in the Behavioral Health domain that failed to meet the CYE 2018 MPS. AHCCCS and the ALTCS EPD Contractors should conduct root cause analyses for the low rates of follow-up visits after hospitalization for mental illness to determine the nature and scope of the issue (e.g., barriers to care, lack of continuity of care, transportation issues, ineffective communication). After the key factors related to the low rates are identified, AHCCCS and the ALTCS EPD Contractors should work with providers and members to establish potential performance improvement strategies and solutions to increase follow-up visits and improve member transitions of care.
UHCCP – LTC conducted a root cause analysis and identified factors negatively impacting well-care visits for children and adolescents: 1. The first root cause for missing the MPS for *FUH* [*Follow-up After Hospitalization for Mental Illness*] is that LTC members discharged from an acute inpatient facility, with a primary discharge diagnosis of mental illness, are not referred directed to a mental health practitioner unless the discharge orders indicate the member needs further evaluation or treatment. Rather, when the case manager completes the PHA, the member is referred to the assigned PCP for follow-up medical services and to coordinate care. 2. A second root cause for missing the MPS for the *FUH* measure is oftentimes medical conditions or admissions to hospitals may exacerbate mental health conditions, but the underlying issue of a member's admission to a hospital may stem from medical etiology. 3. A third root cause for missing the MPS for the *FUH* measure is that members refuse a referral for behavioral health services (if they are not already established), opting to seek treatment from their PCP or other specialty provider instead. 4. A fourth root cause is a change in NCQA [National Committee for Quality Assurance] technical specifications for this measure, no longer counting members compliant if the visit with a behavioral health professional occurred on the same day as discharge. National NCQA HEDIS rates as well as UHCCP – LTC rates dropped significantly as a result in this change in technical specifications.

UHCCP – LTC
HSAG Recommendation: Following a member's discharge from an inpatient admission, Contractors should perform a follow-up call with that member within three days to address any questions or concerns and to discuss progress of the care. AHCCCS and the ALTCS Contractors should ensure that these follow-up calls are being conducted and confirm during each call that the member has a follow-up visit scheduled with a mental health practitioner and access to necessary community resources.
The following are a series of new actions UHCCP – LTC has taken to improve follow-up after hospitalization for mental illness, including performing a follow-up call with the member: 1. UHCCP – LTC updated the Post Hospital Assessment instructions to expand on a question in which the case manager asks the member, "other reason that caused the member to be hospitalized" to include a question or discussion [regarding] if the member had been discharged from an acute inpatient facility with a principal diagnosis of mental illness. If yes, the case manager refers the member to a mental health practitioner and documents his or her response. All case managers were trained on the Post Hospital Assessment instructions by the LTC management team as well as ensuring the member is referred to a behavioral health professional. 2. UHCCP – LTC's oversight process will include a Post Hospital Assessment visit within two days of notification with follow-up with a member who had a principal diagnosis of mental illness upon discharge from an acute inpatient facility to ensure the member had a follow-up outpatient visit with a mental health practitioner. The case manager will document referrals and if applicable, [document] refusal reasons in the member record. 3. Contracted with a vendor based in the inpatient facilities responsible for the oversight of the discharge planning, specific to the scheduling of an outpatient visit within seven days of discharge.

Table 1-7 presents a summary of the follow-up actions per activity that the DES/DDD reported completing in response to HSAG's recommendations included in the *CYE 2019 External Quality Review Annual Report for Arizona Long Term Care System (ALTCS) Contractors* cited earlier in this report.

The text located after each HSAG recommendation box is a summary of the content submitted by the Contractor.

Table 1-7—DES/DDD's Responses to HSAG's Follow-Up Recommendations

DES/DDD
Performance Measures
HSAG Recommendation: HSAG recommended that AHCCCS work with DES/DDD to increase preventive screenings for women and that to understand the cause of the low rates, AHCCCS and DES/DDD should examine potential barriers to women receiving breast cancer and cervical cancer screenings (e.g., provider misconceptions, lack of education, member anxiety) and implement multicomponent interventions to reduce structural barriers.

DES/DDD
DES/DDD used the plan-do-study-act (PDSA) cycle for intervention implementation, remeasurement, and refinement to measure the effectiveness of ongoing and newly implemented interventions. UHCCP (a subcontractor for DES/DDD) had the clinical practice consultants assigned to provider groups and made them responsible for meeting with their assigned groups on a monthly basis to review member gaps-in-care. Clinical Transformation Consultants (CTCs) are assigned to groups that have a value-based contract with UHCCP and are responsible for ensuring their assigned groups receive monthly member gaps-in-care reports. UHCCP implemented a quarterly provider report that is mailed to providers that have fewer than 100 members assigned to their care. The gaps-in-care report includes women missing the cervical cancer screening or chlamydia screening. UHCCP has added cervical cancer screening to the Aggregation model for incentivizing providers, which was launched on October 1, 2019. In May 2020, UHCCP implemented a reminder letter to members to obtain a cervical cancer screening, and a letter to members to obtain a chlamydia test. Both letters include an informational brochure about the recommended service. Additional interventions include educational outreach to female members ages 40–74 to encourage well woman exams and mammograms (*BCS* [*Breast Cancer Screening*]). Providers are notified via mail of members who are due for a mammogram. They are given an order form to sign and send into the Contractor. The member is then contacted and assisted with scheduling a mammogram and submitting an order form. Outreach staff contact members who still have not had a mammogram to assist with scheduling an appointment. Members also receive a reminder card after a three-way-call where an appointment is scheduled.
Performance Improvement Projects
HSAG Recommendation: • DES/DDD is encouraged to meet with AHCCCS to ensure that accurate data are used for the calculation of the PIP rates. • DES/DDD should identify and prioritize barriers so as to develop robust strategies and interventions for the PIP. • DES/DDD is encouraged to monitor the progress of the PIP interventions employed to increase the rate of children receiving a developmental screening, then adjust interventions as needed to ensure that the rates continue to increase by statistically significant amounts during the second remeasurement period. • DES/DDD should monitor the outcomes associated with the interventions and systemwide changes. • AHCCCS may consider working with DES/DDD to ensure the alignment of the screening tools that are allowed by CMS and the tools recognized by AHCCCS. • AHCCCS may want to use more timely data to support performance improvement activities that can be monitored in real time.
DES/DDD used the PDSA cycle for intervention implementation, remeasurement, and measure refinement. One intervention included a member incentive for obtaining a well-child visit, which

DES/DDD
was offered to guardians of members 3 to 6 years of age and 12 to 20 years of age. In CYE 2018, the incentive for W34 [*Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life*] was increased to $50. [UHCCP was a subcontractor to DES/DDD for some performance measure activities.] UHCCP developed an "EPSDT Toolkit" for the CPCs to use with their providers at the provider site visits. The toolkit outlined several AHCCCS requirements of providers, including information on developmental screening and how to bill a well-child visit at the time of the sick visit. The toolkit noted the AHCCCS-approved tools and the process for billing. Interventions included an Annual Developmental Screening provider mailing to educate providers about the importance of completing developmental screenings as well as a written provider outreach process which includes mailings to PCPs for members in need of an EPSDT visit and information pertaining to the members' historical dental care and whether or not the member is due for dental care. This mailing includes information related to developmental screening. Provider pay-for-performance to PCMH/ACO [Patient-Centered Medical Home/Accountable Care Organization] groups for improving performance in the measure was also enacted. In January 2019, UHCCP addressed deficiencies with fee-for-service systems by offering the providers $40 for each developmental screening if the provider met the target of 55 percent completion rate. Additional interventions included monitoring CAQH [Council for Affordable Quality Healthcare] to determine if providers submitting developmental screenings have evidence of a developmental screening training certificate; face-to-face site visits with providers to provide education on developmental screening; Developmental Screening 101 Flyer developed and shared with other pediatric providers at the Sedona AzAAP [American Academy of Pediatrics/Arizona Chapter] conference in June 2017; inclusion of the Developmental Screening 101 Flyer in the MC EPSDT Provider Manual; Early Identification and Management of Autism Spectrum Disorder (ASD) for Primary Care Providers presentation by Dr. Renee Bartos at the MC Provider Forum; and Developmental Screening & Integrated Care for Autism Spectrum Disorder: Navigating the System presentation by Dr. Renee Bartos at the PCP integrated training academy.

2. Introduction to the Annual Technical Report

Description of EQR Activities

Mandatory Activities

As permitted by CMS within federal regulation and described in Section 1—Executive Summary, AHCCCS retained the functions associated with the four CMS mandatory activities for its Contractors:

- Validate Contractor performance measures—validation performed by AHCCCS.
- Validate Contractor PIPs—validation performed by AHCCCS.
- Provide summary and findings of Contractors' performance in complying with the AHCCCS' contract requirements and the federal Medicaid managed care regulations—review performed by AHCCCS.
- Validate Contractor network adequacy—validation performed by HSAG.

AHCCCS contracted with HSAG to aggregate and analyze the data AHCCCS obtained from conducting the four mandatory activities for its Contractors and to prepare this CMS-required EQR annual report of findings and recommendations.

For contracts that started on or after July 1, 2018, and no later than one year from the issuance of the revised EQR protocol, according to requirements set forth in 42 CFR §438.68, CMS is requiring validation of MCO, PIHP, and PAHP network adequacy as applicable.

Optional Activities

AHCCCS' EQRO contract with HSAG did not require HSAG to:

- Conduct any other CMS-defined optional activities (e.g., validating encounter data, conducting focused studies of healthcare quality, or assessing information systems capabilities).
- Analyze and report results, including providing conclusions and recommendations based on optional activities that AHCCCS conducted.

AHCCCS has numerous sophisticated processes for monitoring both the Contractors and its own performance in meeting all applicable federal and State requirements, its goals and internal objectives, and its policies and procedures. AHCCCS regularly prepares meaningful, detailed, and transparent reports documenting the results of its assessments. AHCCCS is transparent with performance results, posting to its website both provider performance reports and the required quarterly reports it submits to CMS. AHCCCS uses the information provided in the CMS-required EQR annual reports to honor its commitment to transparency by posting final reports on its website. The EQR reports provide detailed

information about the EQRO's independent assessment process; results obtained from the assessment; and, as applicable to its findings, recommendations for improvement. AHCCCS uses the information to assess the effectiveness of its current strategic goals and related strategies and to provide a roadmap for potential changes and new goals and strategies.

Quality, Access, and Timeliness

CMS has identified the domains of quality, access, and timeliness as keys to evaluating MCO performance. HSAG used the following definitions to evaluate and draw conclusions about the performance of the MCOs in each of these domains.

- **Quality**, as it pertains to EQR, means the degree to which an MCO, PIHP, PAHP, or PCCM entity (described in §438.310[c][2]) increases the likelihood of desired health outcomes of its enrollees through its structural and operational characteristics, the provision of services that are consistent with current professional, evidence-based knowledge, and interventions for performance improvement.[2-1]
- **Access**, as it pertains to EQR, means the timely use of services to achieve optimal outcomes, as evidenced by managed care plans successfully demonstrating and reporting on outcome information for the availability and timeliness elements ("standards" for the purpose of this report) defined under §438.68 (Network Adequacy Standards) and §438.206 (Availability of Services). Under §438.206, availability of services means that each state must ensure that all services covered under the state's plan are available and accessible to enrollees of MCOs, PIHPs, and PAHPs in a timely manner. The State must also ensure that the MCO, PIHP, and PAHP provider networks for services covered in the contract meet the standards developed by the State in accordance with the network adequacy standards (§438.68). Any state that contracts with an MCO, PIHP, or PAHP to deliver Medicaid services is required by §438.68 to develop and enforce network adequacy standards.[2-2]
- **Timeliness**. Federal managed care regulations at 42 CFR §438.206 require the state to define its standards for timely access to care and services. These standards must take into account the urgency of the need for services. HSAG extends the definition of "timeliness" to include other federal managed care provisions that impact services to enrollees and that require timely response by the MCO/PIHP—e.g., processing expedited member grievances and appeals and providing timely follow-up care. In addition, NCQA defines "timeliness" relative to utilization decisions as follows: "The organization makes utilization decisions in a timely manner to accommodate the clinical urgency of a situation."[2-3] It further discusses the intent of this standard to minimize any disruption in the provision of healthcare.

[2-1] Department of Health and Human Services, Centers for Medicare & Medicaid Services. *Federal Register* Vol. 81, No. 18/Friday, May 6, 2016, Rules and Regulations, p. 27882. 42 CFR §438.320 Definitions; Medicaid Program; External Quality Review, Final Rule.
[2-2] Ibid.
[2-3] National Committee for Quality Assurance. 2013 Standards and Guidelines for the Accreditation of Health Plans.

3. Overview of the Arizona Health Care Cost Containment System (AHCCCS)

This section of the report includes a brief history of the AHCCCS Medicaid managed care programs and a description of AHCCCS' Strategic Plan for State Fiscal Years (SFYs) 2018–2023 (Strategic Plan). The description of the Strategic Plan includes the four goals:[3-1]

- AHCCCS must pursue and implement long-term strategies that bend the cost curve while improving member health outcomes.
- AHCCCS must pursue continuous quality improvement.
- AHCCCS must reduce fragmentation driving toward an integrated healthcare system.
- AHCCCS must maintain core organizational capacity and workforce planning that effectively serves AHCCCS operations.

AHCCCS Medicaid Managed Care Program History

Since 1982, AHCCCS, the single state Medicaid agency for Arizona, has operated under the authority of the federal Research and Demonstration 1115 Waiver, which has allowed for the operation of an integrated managed care model. AHCCCS uses State, federal, and county funds to administer pediatric, acute, long-term, and behavioral healthcare programs to the State's Medicaid members. AHCCCS has an appropriated budget of approximately $17.1 billion to administer its programs, which provide services for 2.2 million individuals and families in Arizona through a provider network credentialed and contracted by its Contractors. The AHCCCS Acute Care Program began in 1982 and in 1988, AHCCCS added the Arizona Long Term Care System (ALTCS) Program for individuals with developmental disabilities, and then expanded the program in January 1989 to include the elderly and physically disabled (EPD) populations. ALTCS provides acute care, behavioral health services, LTC, and case management to AHCCCS members who are elderly, physically disabled, or developmentally disabled and who meet the criteria for receiving care in a residential setting. Services for individuals with developmental disabilities in ALTCS are offered through the Arizona Department of Economic Security/Division of Developmental Disabilities (DES/DDD). The ALTCS members account for less than 4.0 percent of the AHCCCS population, with approximately 21.7 percent of the costs. American Indian/Alaskan Native (AI/AN) members may choose to receive services through the managed care structure, may opt to receive services through the fee-for-service program.

In October 1990, AHCCCS began coverage of comprehensive behavioral health services for seriously emotionally disabled (SED) children younger than 18 years of age who required residential care. Through further expansion, AHCCCS added comprehensive behavioral health coverage for all Medicaid-eligible individuals. The Children's Health Insurance Program (CHIP) was incorporated in

[3-1] Arizona Health Care Cost Containment System. AHCCCS Strategic Plan: State Fiscal Years 2014–2018. Available at: https://www.azahcccs.gov/AHCCCS/Downloads/Plans/StrategicPlan_14-18.pdf. Accessed on: Mar 10, 2021.

Arizona in 1998 and is known as KidsCare. In 2009, due to a persistently severe budget shortfall, a freeze was placed on enrollment in KidsCare. In 2016, Governor Ducey signed Senate Bill (SB) 1457 into law, ending the enrollment freeze on the KidsCare program. Children who qualify for this program receive care through AHCCCS Contractors. In October 2013, children enrolled in the Acute Care Program who had a Children's Rehabilitative Services (CRS) qualifying diagnosis were enrolled into one integrated CRS Contractor, UnitedHealthcare Community Plan (UHCCP). This was done to decrease fragmentation and reduce member confusion; ensure optimal access to primary, specialty, and behavioral care; enhance coordination of all service delivery; improve member outcomes and satisfaction; and streamline administration. At the same time, children with CRS qualifying conditions and enrolled in the ALTCS program, other than in DDD, were fully integrated into their ALTCS Contractors' provided services, including all primary, specialty, long-term, and behavioral healthcare related to the members' CRS conditions.

Before the integration of services into a single health plan that began in April 2014, a member with a serious mental illness (SMI) designation had to coordinate with several healthcare systems to obtain services. As such, the physical health services were provided through the acute health plan; the behavioral health services through the Regional Behavioral Health Authority (RBHA) contracted through the Division of Behavioral Health Services (DBHS); the Medicare system, if the member was also eligible for Medicare; and Medicare Part D for medications. On April 1, 2014, approximately 17,000 members with SMI residing in Maricopa County were transitioned to a single plan, Mercy Maricopa Integrated Care, to manage both their behavioral and physical healthcare needs. Since October 1, 2015, AHCCCS has contracted with two additional integrated health plans to provide both physical and behavioral healthcare services for members with an SMI designation who do not reside in Maricopa County.

New contracts were awarded in March 2017 to three MCOs throughout Arizona to administer Arizona's integrated long-term care system for individuals who are elderly and/or physically disabled. Awards were based on the bidder's proposed approaches for care and treatment of ALTCS individuals using a fully integrated care perspective at both the systemic and direct care levels (e.g., use of health homes, electronic health records [EHRs], coordinated case management, and collaboration between behavioral and physical health). Although Arizona's ALTCS model has historically provided integrated care that included behavioral health treatment, emphasis was added to promote greater use of Arizona's behavioral health model, particularly regarding individuals who have been determined to have SMI. The newly awarded long-term care system contracts were implemented on October 1, 2017.

Effective October 1, 2018, AHCCCS implemented a delivery system reform that allows members to access physical and behavioral healthcare services through a single integrated delivery system model, AHCCCS Complete Care (ACC), with seven health plans. In addition, on October 1, 2018, service delivery was restructured into three geographic service areas (GSAs): North, Central, and South. Members continue to have a choice of health plans in their geographic service areas and to have access to a network of providers and the same array of covered services. RBHAs continue to provide specific crisis services and to serve members with SMI, children in foster care, and DES/DDD eligible members. American Indian members have the choice of enrolling in an ACC managed care plan or the American Indian Health Program (AIHP) and a Tribal RBHA when available. American Indian members have the

same access to Indian Health Service (IHS) providers, Tribal 638 providers, and Urban Indian Health providers regardless of whether they are receiving services through managed care or the fee-for-service program.

AHCCCS Waiver Amendment Requests and Legislative Updates

1135 Waiver Update

On March 17 and March 24, 2020, AHCCCS submitted requests to the administrator for CMS to waive certain Medicaid and KidsCare requirements to enable the State to combat the continued spread of COVID-19. AHCCCS was seeking a broad range of emergency authorities to strengthen the provider workforce and remove barriers to care for AHCCCS members, enhance Medicaid services and supports for vulnerable members for the duration of the emergency period, and remove cost sharing and other administrative requirements to support continued access to services.

Specifically, Arizona requested authority to implement the following flexibilities, for the duration of the emergency period, under an 1135 Waiver:[3-2]

- Permit providers located out of state to offer both emergency and non-emergency care to Arizona Medicaid and CHIP enrollees.
- Streamline provider enrollment requirements.
- Cease revalidation of providers who are located in state or otherwise directly impacted by the disaster event.
- Waive the requirement that physicians and other healthcare professionals be licensed in Arizona, to the extent consistent with state law.
- Waive payment of the provider enrollment application fee.
- Waive requirements for site visits to enroll a provider.
- Suspend Medicaid fee-for-service (FFS) prior authorization requirements.
- Require FFS providers to extend existing prior authorizations through the termination of the emergency declaration.
- Suspend pre-admission screening and annual resident review (PASRR) Level I and Level II assessments.
- Waive requirements for written member consents and member signatures on plans of care.
- Waive the face-to-face requirement applicable to Home Health Services including medical supplies, equipment, and appliances.

[3-2] Arizona Health Care Cost Containment System. RE: Request for Emergency Authorities to Support Arizona's Response to COVID-19 [Letter]. Available at: https://azgovernor.gov/governor/news/2020/03/arizona-medicaid-program-receives-authority-implement-program-changes-address. Accessed on: Mar 10, 2021.

- Temporarily allow services provided within the ALTCS program to be provided in settings that have not been determined to meet the home and community-based services (HCBS) criteria.

In addition to the 1135 Waiver flexibilities, Arizona also requested the following 1115 Waiver and Appendix K authorities for the duration of the emergency period:[3-3]

- Expand the current limit for respite hours to 720 hours per benefit year (current limit is 600 hours per benefit year).
- Permit payment for HCBS rendered by family caregivers or legally responsible individuals.
- Expand the provision of home-delivered meals to all eligible populations.
- Provide temporary housing (not to exceed six months) if a beneficiary is homeless or is at imminent risk of homelessness and has tested positive for COVID-19.

This also included the authority to:[3-4]

- Make retention payments to all provider types as appropriate (including but not limited to HCBS providers).
- Provide long-term care services and supports to impacted members regardless of whether or not timely updates are made in the plan of care, or if services are delivered in alternative settings.
- Waive the State from complying with the HCBS settings requirement at 42 CFR §441.301(c)(4)(vi)(D), which details that individuals are able to have visitors of their choosing at any time, for settings added after March 17, 2014 (the State is seeking this authority to minimize the spread of infection during the COVID-19 pandemic).
- Add an electronic method of service delivery (e.g., telephonic), allowing services to continue to be provided remotely in the home setting for case managers, personal care services that only require verbal cueing, and in-home habilitation.
- Expand the provision of home-delivered meals to LTC members enrolled in the ALTCS DES/DDD.
- Modify service providers for home-delivered meals to allow for additional providers, including non-traditional providers.
- Allow case management entities to provide direct services in response to COVID-19.
- Extend reassessments and reevaluations of a member's institutional level of need for up to one year past the due date, if needed.
- Allow the option to conduct evaluations, assessments, and person-centered service planning meetings virtually/remotely in lieu of face-to-face meetings.
- Adjust prior approval/authorization criteria approved in the waiver.
- Adjust assessment requirements.

[3-3] Ibid.
[3-4] Arizona Health Care Cost Containment System. Summary of AHCCCS Request to CMS for Additional Flexibilities. Available at: https://azgovernor.gov/governor/news/2020/03/arizona-medicaid-program-receives-authority-implement-program-changes-address. Accessed on: Mar 10, 2021.

- Add an electronic method of signing off on required documents, such as the person-centered service plans.
- Temporarily expand setting(s) where services may be provided (e.g., hotels, shelters, schools, and churches).
- Temporarily allow for payment for services to support waiver participants in an acute care hospital or short-term institutional stay when necessary supports (including communication and intensive personal care) are not available in that setting, or when the individual requires those services for communication and behavioral stabilization, and such services are not covered in such settings.

CMS approved components of Arizona's request under the 1135 Waiver, Appendix K, and State Plan. Information regarding the status of AHCCCS Emergency Authority Requests (for the federally declared COVID-19 emergency) can be found on the AHCCCS COVID-19 Federal Emergency Authorities Request web page.

1115 Waiver Renewal

Arizona's 1115 Waiver demonstration is set to expire on September 30, 2021. As a result of the COVID-19 pandemic, AHCCCS received a three-month extension from CMS to submit the waiver renewal application packet. AHCCCS is requesting a five-year renewal of Arizona's demonstration project under Section 1115 of the Social Security Act. Arizona's existing demonstration project is currently approved through September 30, 2021, and the application is seeking a renewal period from October 1, 2021, through September 30, 2026. AHCCCS submitted a waiver application to CMS to renew its 1115 Waiver demonstration on December 22, 2020.

The current demonstration exempts Arizona from particular provisions of the Social Security Act and also includes expenditure authority permitting federal financial participation (FFP) for State expenditures that would not otherwise qualify for federal participation. Moreover, demonstration projects, including Arizona's, must establish budget neutrality where Medicaid costs to the federal government are not expected to exceed costs to the federal government in the absence of the demonstration.

CMS' approval of Arizona's demonstration renewal application will continue the success of Arizona's unique Medicaid program and statewide managed care model, extending authority for Arizona to implement programs including, but not limited to:[3-5]

- Mandatory managed care.
- Home and community-based services for individuals in ALTCS.

[3-5] Arizona Health Care Cost Containment System. AHCCCS Requests Public Comment on Proposed 2021–2026 Waiver Renewal. Available at: https://www.azahcccs.gov/shared/News/PressRelease/AHCCCSRequestsPublicCommentOnWaiverRenewal.html. Accessed on: Mar 10, 2021.

- Administrative simplifications that reduce inefficiencies in eligibility determination.
- Integrated health plans for AHCCCS members.
- Payments to providers participating in the Targeted Investments (TI) Program.
- Waiver of Prior Quarter Coverage for specific populations.
- AHCCCS Works Community Engagement Program (not yet implemented).

In addition to renewing current waiver and expenditure authorities, AHCCCS is seeking to implement the following:[3-6]

- Authority to allow for verbal consent in lieu of written signature for up to 30 days for all care and treatment documentation for ALTCS members when included in the member's record and when identity can be reliably established.
- Authority to reimburse traditional healing services provided in, at, or as part of services offered by facilities and clinics operated by the IHS, a tribe or tribal organization, or an Urban Indian health program.
- Authority to reimburse IHS and Tribal 638 facilities to cover the cost of adult dental services that are eligible for 100 percent FFP, that are in excess of the $1,000 emergency dental limit for adult members in Arizona's State Plan, and $1,000 dental limit for individuals ages 21 or older enrolled in the ALTCS program.

More details on Arizona's Section 1115 Waiver renewal request (2021–2026), along with the proposal and supplemental documentation, can be found on the Arizona's Section 1115 Waiver Renewal Request (2021-2026) web page.

1115 Waiver Evaluation

In accordance with Special Terms and Conditions (STC) 59, AHCCCS must submit a draft Waiver Evaluation Design for its 1115 Waiver Demonstration. In addition, AHCCCS is also required by CMS to submit an Interim Evaluation Report and a Summative Evaluation Report of the 1115 Waiver Demonstration by December 31, 2020, and February 12, 2023, respectively.

AHCCCS has contracted with HSAG to serve as the independent evaluator for Arizona's 1115 Waiver Demonstration. In SFY 2019, AHCCCS worked with HSAG to develop evaluation design plans for the following programs: ACC Program; ALTCS Program; Comprehensive Medical and Dental Program (CMDP); RBHAs; TI Program; Waiver of Prior Quarter Coverage; and the AHCCCS Works Program.

[3-6] Arizona Health Care Cost Containment System. AHCCCS Requests Public Comment on Proposed 2021–2026 Waiver Renewal. Available at: https://www.azahcccs.gov/shared/News/PressRelease/AHCCCSRequestsPublicCommentOnWaiverRenewal.html. Accessed on: Mar 10, 2021..

On November 13, 2019, AHCCCS submitted an evaluation design plan to CMS for Arizona's Demonstration components (ACC, ALTCS, CMDP, RBHA, TI Program, and Waiver of Prior Quarter Coverage). Additionally, HSAG developed and submitted a separate evaluation design plan to CMS for the AHCCCS Works program. Arizona intends to use this design plan to guide the evaluation of the AHCCCS Works program upon implementation of the community engagement requirements, if the program is implemented. Arizona's Waiver Evaluation Design Plan was approved by CMS on November 19, 2020.

As required by the STCs of Arizona's approved Demonstration, an interim evaluation report must be submitted that discusses the evaluation progress and findings to date in conjunction with Arizona's Demonstration renewal application. Arizona's Interim Evaluation Report was submitted along with the Waiver Renewal Application in December 2020.

Due to limitations in the availability of data and operational constraints imposed by the COVID-19 pandemic, Arizona's current interim evaluation report does not include data from all sources described in Arizona's evaluation design plan. Qualitative data based on key informant interviews and focus groups, as well as beneficiary survey data, were not collected. For this reason, HSAG will complete an updated interim evaluation report in fall of 2021. This report will contain results for additional years and include findings to date from focus groups and qualitative interviews. In addition, the updated interim evaluation report will use statistical techniques, where possible, to control for confounding factors and identify the impact of Arizona's Demonstration initiatives on access to care, QOC, and member experience with care. AHCCCS intends to post the updated interim evaluation report to its website.

Legislative Updates

The legislature passed several bills in the 2020 Legislative session that will impact AHCCCS including:

- HB 2244—Requires AHCCCS to request CMS approval for the provision of dental services beyond current service limitations when provided at IHS/638 facilities which are eligible for 100 percent Federal Medical Assistance Percentage (FMAP).
- HB 2668—Establishes a new hospital assessment which can be used to create a hospital directed payment program, increase practitioner and dental rates, and pay for administrative expenses. Funds cannot be used to pay for base reimbursement levels.
- SB 1523—The Mental Health Omnibus bill requires commercial insurers to report on mental health parity, establishes funding to pay for behavioral health services in schools for uninsured/underinsured children, and creates the suicide mortality review team at the Arizona Department of Health Services.

The Arizona Legislature adjourned *sine die* on May 26, 2020; the general effective date for legislation was August 25, 2020.

AHCCCS' Strategic Plan

AHCCCS' Strategic Plan for SFY 2021 presents the strategy and direction for AHCCCS, including new programs, initiatives, and past accomplishments. The Strategic Plan identifies AHCCCS' mission, vision, and core values:[3-7]

- AHCCCS Vision: Shaping tomorrow's managed healthcare…from today's experience, quality, and innovation.
- AHCCCS Mission: Reaching across Arizona to provide comprehensive quality healthcare to those in need.

The Strategic Plan offers four multi-year strategies:

1. Pursue and implement long-term strategies that bend the cost curve while improving member health outcomes.

- Incentivize performance-based contracting.
- Increase Arizona Medicaid providers' capacity to deliver services via telemedicine.

2. Pursue continuous quality improvement.

- Stand up Electronic Visit Verification (EVV) system, aimed at enhancing the provision of quality care while reducing fraud, waste, and abuse (FWA).
- Stand up automated provider enrollment system (AHCCCS Provider Enrollment Portal or APEP).
- Address health disparities through care coordination and case management.

3. Reduce fragmentation driving toward an integrated sustainable healthcare system.

- Promote integration at practice level/point of care.
- Promote AHCCCS member connectivity to critical social services.
- Establish singular entity to administer the distribution of housing funding, including housing and housing supports, statewide.

4. Maintain core organizational capacity, infrastructure, and workforce planning that effectively serves AHCCCS operations.

- Maintain ongoing functionality of AHCCCS eligibility system, HEAplus.
- Increase employee engagement.

[3-7] Arizona Health Care Cost Containment System. *AHCCCS Strategic Plan State Fiscal Years 2018–2023*. Available at: https://www.azahcccs.gov/AHCCCS/Downloads/Plans/StrategicPlan_18-23.pdf. Accessed on: Mar 11, 2021.

- Ensure staff have technology needed to perform job functions in office and in remote work environments.

Key Accomplishments for AHCCCS

Following are key AHCCCS accomplishments related to the AHCCCS SFY 2020 Strategic Plan:

- Retained 98 percent of Targeted Investment Program providers.
- Increased the number of provider organizations participating in the statewide Health Information Exchange by 25 percent.
- Increased the number of pre-release inmates who received a service within three months of release by over 50 percent.
- Increased the number of CMDP enrollees accessing behavioral health services by more than 15 percent.
- Exceeded target of a 10 percent increase in students receiving behavioral health services on school campuses with an actual increase of more than 43 percent over the prior year.
- Successfully housed 25 individuals who were chronically homeless in downtown Phoenix.
- Established six American Indian Medical Homes.
- Served more than 25,000 individuals under the State Opioid Response grant.

AHCCCS Quality Strategy

AHCCCS enhanced its Quality Strategy report by reevaluating the report's structure, content, and data analysis. Part of the approach was to incorporate synchronized reporting processes to ensure alignment across various AHCCCS reports that relate to quality (e.g., Strategic Plan, Quality Strategy, and External Quality Review Organization Report). The AHCCCS Quality Strategy, Assessment and Performance Improvement Report is a coordinated, comprehensive, and proactive approach to drive improved health outcomes by using creative initiatives, ongoing assessment and monitoring, and results-based performance improvement. Members, the public, and stakeholders provide input and recommendations regarding the content and direction of the Quality Strategy through stakeholder presentations and public comments.

AHCCCS' enhanced Quality Strategy was submitted to CMS in July 2018 for review and approval. In June 2020, AHCCCS began efforts to update its Quality Strategy to reflect changes within the Arizona Medicaid delivery system as well as incorporate the feedback received from CMS, in alignment with required elements outlined in 42 CFR §438.340. AHCCCS' Quality Strategy updates were posted to the AHCCCS website on June 30, 2021, and were submitted to CMS on July 1, 2021.

4. Quality Initiatives

AHCCCS continued to demonstrate innovative and collaborative approaches to managing costs while improving the quality of systems, care, and services. The July 1, 2018, Quality Strategy, Assessment and Performance Improvement Report (Quality Strategy); the 2018–2023 strategic plan, and the quarterly quality assurance/monitoring activity reports provided compelling evidence of AHCCCS' vision and leadership in identifying and proactively pursuing opportunities to improve access to, and the quality and timeliness of care and services, as well as improve member health outcomes.

Quality Initiative Selection and Initiation

AHCCCS has several initiatives underway aimed at building a more cohesive, effective healthcare system in Arizona by reducing fragmentation, structuring provider reimbursements to incentivize quality outcomes, leveraging health information technology (HIT), and working with private sector partners to further innovation to the greatest extent.

Systemwide Quality Initiatives/Collaboratives

Accessing Behavioral Health Services in Schools[4-1]

AHCCCS partnered with the Arizona Department of Education (ADE) and others to ensure students who are Medicaid eligible can receive behavioral health services in school settings. AHCCCS helps school administrators and leaders connect with behavioral health providers statewide to meet their students' needs.

While schools have historically been approved settings for Medicaid-covered behavioral health services, in 2018 $3 million in State General Fund dollars were appropriated to expand behavioral health services in schools; $1 million of this funding is being used in partnership with the ADE to provide mental health training to schools and school districts. The remaining dollars are matched with federal funds to generate $10 million in Medicaid funding to AHCCCS health plans to bring established behavioral health providers into the school setting, meet Medicaid-eligible students where they are and where they have health needs, and pay for Medicaid-covered behavioral health services in schools.

AHCCCS is Arizona's Managed Care Medicaid Program, developed as a result of Title XIX of the Social Security Act. While AHCCCS also administers other State and federal healthcare programs, only Title XIX members are eligible for the Direct Service Claiming (DSC) Program. The Medicaid Administrative Claiming (MAC) program is one of the two federally funded programs endorsed by the

[4-1] Arizona Health Care Cost Containment System. Accessing Behavioral Health Services in Schools. Available at: https://www.azahcccs.gov/AHCCCS/Initiatives/BehavioralHealthServices/. Accessed on: Mar 11, 2021.

ADE and AHCCCS. AHCCCS is the agency that develops the policies and administers the Medicaid School Based Claiming Program through the Public Consulting Group (PCG) and in collaboration with the ADE.

In 2020, the Arizona Legislature passed Jake's Law, which allocated $8 million for the provision of behavioral health services to uninsured and underinsured children referred through an educational institution. AHCCCS has leveraged the RBHAs to oversee the delivery of these services and has partnered with multiple system stakeholders including ADE to promote the availability of these services. A report on the services provided and survey responses from individuals who were served through this funding will be compiled and sent to the Governor's office in December 2022.

AHCCCS Works Community Engagement Program[4-2]

When people engage in their communities—through employment, education, skills training, or volunteering—they are more likely to experience improved health outcomes. Some able-bodied, 19 to 49-year-old members will be required to participate in community engagement activities for at least 80 hours every month and report activities monthly. American Indian/Alaska Native members are exempt from this requirement.

Qualifying activities include:

1. Employment (including self-employment).
2. Less than full-time education.
3. Job or life skills training.
4. Job search activities.
5. Community service.

All members will have a three-month period at the start in which to become familiar with requirements and tools available to ensure their success. After that three-month period, members who do not complete at least 80 hours of community engagement in a month will be suspended from AHCCCS coverage for two months, and then automatically reinstated. On October 17, 2019, AHCCCS informed CMS of Arizona's decision to postpone implementation of AHCCCS Works until further notice. This decision was informed by the evolving national landscape concerning Medicaid community engagement programs and ongoing related litigation.

[4-2] Arizona Health Care Cost Containment System. AHCCCS Works Community Engagement Program. Available at: https://www.azahcccs.gov/AHCCCS/Initiatives/AHCCCSWorksCommunityEngagement/. Accessed on: Mar 11, 2021.

Building an Integrated Health Care System[4-3]

AHCCCS has various initiatives designed to improve care coordination and communication while reducing fragmentation to create a healthcare system with more effective outcomes. AHCCCS continues to integrate the care delivery systems and align incentives that are designed to transform the structure of the Medicaid program, improve health outcomes, and better manage limited resources.

Integrating Services for ALTCS DDD Members—The DES/DDD provides healthcare to eligible DDD members through ALTCS. Starting October 1, 2019, behavioral health service responsibility for these enrolled members has transitioned from the RBHAs to two integrated health plans subcontractors—Mercy Care Plan and UnitedHealthcare Community Plan. This transition included members with an SMI designation and DDD members with qualifying CRS conditions.

Integrating Behavioral and Physical Health for Persons with an SMI designation—In Arizona, behavioral health has historically been a carved-out benefit separately managed by RBHAs. As such, a person with an SMI designation could navigate up to four different healthcare systems to get care. Navigating the healthcare system is one of the greatest barriers to accessing care. The result for Arizonans with an SMI designation was less than optimal. Concerns around poor medication management and stigma caused many people to forgo physical healthcare. Because many persons with SMI also experience co-morbidities, management of chronic diseases like diabetes or hypertension was also poor.

Although a significant portion of the behavioral health service delivery for adults and children has been moved to the AHCCCS Complete Care (ACC) plans, the RBHAs have played a critical role in providing the following services:

- Integrated physical and behavioral health services for members determined to have an SMI designation. Enrollment in each geographic service area (GSA) as of November 1, 2020, for Title XIX XXI covered members determined to have an SMI designation:
  - North GSA: 6,114.
  - Central GSA: 25,074.
  - South GSA: 13,992.
- Behavioral health services for members in the custody of the Department of Child Safety and enrolled in the Department of Child Safety/Comprehensive Medical and Dental Program. Effective 4/1/2021, this program became known as Mercy Care Department of Child Safety/Comprehensive Health Plan (Mercy Care DCS CHP) enrollment as of September 1, 2020, was 13,563
- Behavioral health services for ALTCS members enrolled with the Department of Economic Security/Division of Developmental Disabilities (DES/DDD); enrollment as of September 1, 2020, was 35,870.

[4-3] Arizona Health Care Cost Containment System. Building an Integrated Health Care System. Available at: https://www.azahcccs.gov/AHCCCS/Initiatives/CareCoordination/. Accessed on: Mar 11, 2021.

- Crisis services including telephone, community-based mobile, and facility-based stabilization (including observation not to exceed 24 hours), and Substance Abuse and Mental Health Services Administration (SAMHSA) grants and other services, including housing.

Medicare and Medicaid Alignment for Dual Eligibles: Alignment Makes a Difference—Medicare presents one of the greatest challenges to states serving individuals dually eligible for Medicaid and Medicare. Medicare is its own distinct, complex system of care operated by the federal government with little to no interface with state Medicaid programs. For the over 150,000 Arizonans who are eligible for both Medicare and Medicaid, navigating these two separate systems of care can be overwhelming. Under these circumstances, people "fall through the cracks," inefficient care is provided, and optimal health outcomes are not achieved.

AHCCCS moved toward increasing the coordination of health service delivery between these two health programs by contracting with Medicare Advantage Dual Special Needs Plans (D-SNPs) that are each affiliated with its partner ACC Medicaid health plan. Requiring each ACC Medicaid health plan to offer a partner Medicare D-SNP promotes the enrollment or alignment of dual-eligible members in the same health plan for both Medicare and Medicaid services to the greatest possible extent. Enrolling in specialized Medicare plans allows dual-eligible members to receive all of their healthcare services, including prescription drug benefits, from a single, integrated health plan.

Simplifying the System of Care for Children with Special Health Care Needs (SHCN): CRS—CRS was started in 1929 to serve children with complex healthcare needs who require specialized services. Services for the treatment of CRS qualifying conditions were previously managed solely through the CRS program. Medicaid members would then have to access routine or other non-CRS specialty physical healthcare through their AHCCCS acute plan and behavioral health through the RBHA. For children who were Medicare eligible, the family had one additional hurdle. Arizona families attempting to care for their child with SHCN were being asked to navigate up to four systems of care.

Beginning October 1, 2018, members that qualify for a CRS designation and are not enrolled with DES/DDD have a choice of ACC plans that service their area. The ACC plan manages care for all services (including CRS, other non-CRS physical health services, and all covered behavioral health services). Effective October 1, 2019, members enrolled with DES/DDD will use their assigned DES/DDD plan for all of their CRS and non-CRS physical health and behavioral health services. DES/DDD continues to provide long-term care services for these members, thus minimizing the need for members to navigate multiple systems for care.

Justice System Transitions—AHCCCS has partnered with State and county governments to improve coordination within the justice system and create more cost-effective and efficient ways to transition people leaving the criminal justice system. A significant number of men, women, and children transitioning out of jail and prison into communities are in need of services for behavioral health and physical health conditions. Many of these individuals are eligible for Medicaid.

To facilitate this transition, AHCCCS is engaged with the ADOC and most Arizona counties covering the majority of the State's population, including the two largest—Maricopa and Pima—in a data exchange process that allows AHCCCS to suspend eligibility upon incarceration, rather than terminate

coverage. This exchange also allows ADOC and counties to electronically send discharge dates, which simplifies the process of transitioning directly into care. Through this enrollment suspension process, care can be coordinated by county jails or prisons upon discharge. To support this, all RBHAs are contractually required to have a justice systems contact that can ensure a connection to needed behavioral health services. In addition, AHCCCS medical management coordinates with counties to facilitate a transition to care into acute health plans for persons being discharged with serious physical illnesses, such as cancer or other illness, that present public health concerns or require immediate attention.

Connecting Communities: The Importance of Private Sector Partners[4-4]

The AHCCCS program was founded on a competitive, public/private partnership model. AHCCCS began in 1982 as the first statewide mandatory managed care program, placing all enrollees (except American Indians/Alaska Natives) in health plans for acute care, long-term care, and behavioral health (known as RBHAs). Medicaid managed care has evolved and answered the call toward continued innovation and population health strategies.

These contractors do far more than simply pay claims. Today's health plans use sophisticated data analytics tools to assess member risk and develop innovative intervention protocols. In addition, health plans engage their members in person-centered approaches. This often means engaging families and communities, too, so that members have the tools they need to manage their own health. This level of engagement also assists the health plan in developing strategies that respond to community needs.

The relationship between AHCCCS and the health plans is of critical importance. It is integral to the success of the partnership that both parties are willing to come to the table and engage in meaningful discussions about our members, delivery systems, and stakeholders. The connection, partnership, and transparency between AHCCCS and the health plans is the cornerstone to their success.

Electronic Visit Verification[4-5, 4-6]

Electronic visit verification (EVV) ensures timely service delivery for members including real-time service gap reporting and monitoring. EVV will serve as an electronic verification method to help reduce administrative burden associated with hard copy timesheet processing as well as generate cost savings from the prevention of fraud, waste, and abuse. AHCCCS is mandated to implement EVV for non-skilled, in-home services (attendant care, personal care, homemaker, habilitation, respite) and for in-home skilled nursing services (home health).

[4-4] Arizona Health Care Cost Containment System. Connecting Communities: The Importance of Private Sector Partners. Available at: https://www.azahcccs.gov/AHCCCS/Initiatives/PrivateSectorPartners/. Accessed on: Mar 11, 2021.
[4-5] Arizona Health Care Cost Containment System. AHCCCS E.V.V. Electronic Visit Verification. Available at: https://www.azahcccs.gov/AHCCCS/Initiatives/EVV/. Accessed on: Mar 11, 2021.
[4-6] Arizona Health Care Cost Containment System. AHCCCS Initiatives and Best Practices. Available at: https://www.azahcccs.gov/AHCCCS/Initiatives/. Accessed on: Mar 11, 2021.

Emergency Triage, Treat and Transport to Transform EMS Delivery[4-7]

The Emergency Triage, Treat and Transport initiative (ET3) is a voluntary, five-year CMS Innovation Center Payment Model designed to provide greater flexibility to ambulance care teams addressing emergency healthcare needs. ET3 aims to reduce unnecessary transports to emergency departments, while simultaneously connecting members with the appropriate level of care, at the right time and at the right place. AHCCCS is working toward implementing a model based on ET3 for providers registered with AHCCCS as an emergency ambulance provider in the Fall of 2021. The goal of this program is to reduce hospital admissions, while improving quality and reducing costs.

Health Equity Committee[4-8]

Formally established in July 2020, the Health Equity Committee was tasked with understanding health disparities and developing strategies to ensure health equity for all AHCCCS-eligible individuals and members. This committee was responsible for overseeing and managing recommendations as they relate to policy, data, health plan oversight, and emerging healthcare innovation strategies for over 2 million Arizonans.

Healthy People 2020 defines health equity as the "attainment of the highest level of health for all people. Achieving health equity requires valuing everyone equally with focused and ongoing societal efforts to address avoidable inequalities, historical and contemporary injustices, and the elimination of health and health care disparities."

This committee is responsible for identifying health disparities among AHCCCS-eligible individuals and members by using AHCCCS utilization and quality improvement data to advance policy and/or contracting strategies to improve the health equity of AHCCCS' populations and programs. This committee will communicate existing health equity strategies currently being implemented by AHCCCS, identify needed improvements to existing strategies (if appropriate), develop and/or evaluate key metrics, and articulate future interventions aimed at eliminating health disparities.

Committee Goals:

- Understand health disparities among AHCCCS members.
- Effectuate policy changes and support the implementation of strategies for positive improvement where known disparities exist, creating opportunities for the more equitable provision of services and supports.
- Raise the visibility of AHCCCS' commitment to health equity and the strategies in place to ensure the equitable provision of services and supports.
- Improve health outcomes for AHCCCS members.
- Identify challenges and barriers that AHCCCS members have in accessing covered services.

[4-7] Ibid.
[4-8] Arizona Health Care Cost Containment System. Health Equity Committee. Available at: https://www.azahcccs.gov/AHCCCS/Initiatives/HEC/index.html. Accessed on: Mar 11, 2021.

Improving Communications and Care Coordination: Health Information Technology

Since 2006, AHCCCS providers and MCOs have been supporting a single statewide HIE, now called Health Current. Health Current has become an integral part of AHCCCS' Quality Strategy and has grown to include over 880 participating organizations representing laboratories, physical health and behavioral health providers, state agencies, 42 other HIEs, and other payers, such as Accountable Care Organizations and for-profit health plans. These organizations represent thousands of healthcare practitioners and delivery sites across Arizona.

MCOs are using the clinical data available at Health Current to support their healthcare coordination and care management operations. MCOs provide member panels to the HIE in order to receive a variety of real-time alerts (including COVID-19 test results and hospital admission, discharge, and transfer (ADT); other inpatient; or discharge clinical event alerts), as determined by the MCOs.

Incentivizing Quality: Payment Modernization[4-9]

Modernizing the way healthcare services are purchased means rethinking the end product. Traditional reimbursement structures favor the provider with higher production numbers (i.e., performs more services without regard to outcome). To bend the cost curve, there must be a paradigm shift such that reimbursement favors the provider who achieves a quality health outcome. That is why payment modernization is a critical policy strategy for moving to a financially sustainable and value-based healthcare delivery system.

To that end, AHCCCS is continuing its pursuit to implement long-term strategies that bend the cost curve while improving member health outcomes. The overall mission is to leverage the AHCCCS managed care model toward value-based healthcare systems where patients' experience and population health are improved, per-capita healthcare costs are limited to the rate of general inflation through aligned incentives with MCO and provider partners, and there is a commitment to continuous quality improvement and learning.

Strategies

- Align Payer & Provider Incentives: Establish payment systems that encourage collaboration to improve affordability, access, and quality results for individuals.
- Payment and Care Delivery Transformation: Transform the healthcare delivery system and achieve the three-part aim outlined by the Institute of Medicine (IOM): better care, healthy people/healthy communities, and affordable care.
- Innovate through Competition: Enact performance expectations that reward innovation and results.
- Pay for Value: Pay for outcomes of care rather than quantity of care.

[4-9] Arizona Health Care Cost Containment System. AHCCCS Payment Modernization. Available at: https://www.azahcccs.gov/AHCCCS/Initiatives/PaymentModernization/. Accessed on: Mar 15, 2021.

- Collaborative Learning: AHCCCS is a committed partner in the Health Care Payment Learning and Action Network (LAN). The goal of the LAN is to accelerate the healthcare system's adoption of effective alternative payment models (APMs). AHCCCS will work to continue to shift an increasing percentage of payments into Categories 3 and 4 value-based structures. The LAN also has a compendium of APM resources for healthcare providers and payers.

Telehealth Services[4-10]

Delivering healthcare services through telehealth provides an alternative way for AHCCCS members to see their healthcare providers. AHCCCS covers all major forms of telehealth technologies and holds ongoing discussions with contracted managed care health plans, providers including IHS/638 facilities, and members to determine how telehealth should be leveraged to serve members and improve healthcare outcomes.

Telehealth is the use of digital technology, like computers, telephones, smartphones, and tablets, to access healthcare services remotely. AHCCCS members who cannot travel to an office can use these devices from their homes to attend healthcare appointments with their providers. Telehealth can make access to healthcare more convenient, saving time and transportation costs.

AHCCCS covers all major forms of telehealth services. Asynchronous (also called "store and forward") occurs when services are not delivered in real-time but are uploaded by providers and retrieved, perhaps to an online portal. Telephonic services (audio-only) use a traditional telephone to conduct healthcare appointments. Telemedicine involves interactive audio and video, in a real-time, synchronous conversation. AHCCCS also covers telehealth for remote patient monitoring and teledentistry.

During the COVID-19 pandemic, AHCCCS added flexibilities to telehealth coverage to promote physical distancing and limit the spread of COVID-19 while also promoting access to healthcare; these flexibilities are posted in the AHCCCS COVID-19 FAQs on telehealth.

Transforming Healthcare Delivery: Targeted Investments Program[4-11]

The TI Program provides financial incentives to eligible AHCCCS providers to develop systems that integrate and coordinate physical and behavioral healthcare. The TI Program aims to reduce fragmentation that occurs between acute care and behavioral healthcare, increase efficiencies in service delivery for members with behavioral health needs, and improve health outcomes for the affected populations.

[4-10] Arizona Health Care Cost Containment System. Telehealth Services. Available at: https://www.azahcccs.gov/AHCCCS/Initiatives/Telehealth/. Accessed on: Mar 11, 2021.
[4-11] Arizona Health Care Cost Containment System. Targeted Investments Program Overview. Available at: https://www.azahcccs.gov/PlansProviders/TargetedInvestments/. Accessed on: Mar 11, 2021.

In accordance with 42 CFR §438.6(c) and the 1115 Waiver, managed care plans will provide financial incentives to eligible Medicaid providers who meet certain benchmarks for integrating and coordinating physical and behavioral healthcare for Medicaid beneficiaries. The TI Program aims to:

- Reduce fragmentation between acute and behavioral healthcare.
- Increase efficiencies in service delivery for members with behavioral health needs by improving integration at the provider level.
- Improve health outcomes for members with physician health and behavioral health needs.

Virtual Office[4-12]

Since the start of the COVID-19 public health emergency, the majority of AHCCCS employees have been working remotely. Once the public health emergency ends and in-office work environments are again safe, more than 60 percent of employees in the Central Phoenix office will continue to work from "virtual offices," thus allowing the agency to consolidate its physical footprint. In February 2021, AHCCCS reduced its Phoenix office space by half, saving $1.2 million annually. This transition promotes efficient and productive staff and allows for better work/life balance, as well as staff health and wellbeing. AHCCCS has also been able to directly correlate the move to virtual offices to greater staff retention.

AHCCCS 2020 Year in Review[4-13]

The COVID-19 public health emergency was an overarching priority in 2020 as AHCCCS worked to put measures in place to ensure provider viability and member access to care. Technology, policy, and member service innovations like the AHCCCS Provider Enrollment Portal (APEP), EVV, and American Indian Medical Homes will streamline business processes and improve care coordination.

Innovations in Service Delivery and Technology

- Successfully transitioned more than 60 percent of AHCCCS employees to a virtual work environment, allowing AHCCCS to consolidate two main campus buildings into one.
- Supported the work of the Governor's Abuse and Neglect Prevention Task Force through the Oct. 1, 2020, implementation of minimum subcontract provisions aimed at preventing abuse, neglect, and exploitation. This Task Force brings a comprehensive prevention focus to the most vulnerable

[4-12] Arizona Health Care Cost Containment System. State Medicaid Agency Consolidates Downtown Phoenix Office Space to Save $1.2 Million Annually. Available at: https://www.azahcccs.gov/shared/News/GeneralNews/BuildingConsolidation.html. Accessed on: Mar 11, 2021.

[4-13] Arizona Health Care Cost Containment System. 2020 Year in Review. Available at: https://www.azahcccs.gov/shared/Downloads/News/2020/2020_YearInReview.pdf. Accessed on: Mar 11, 2021.

members and supports a cross-functional approach across numerous agencies and stakeholders as well as with support from the Governor's Office.

- Launched the APEP, allowing providers to enroll with AHCCCS electronically any time of day.
- Implemented an EVV system to verify member receipt of critical in-home services.
- Improved the timely processing of Medicaid applications to 94 percent for non-ALTCS applications and to 91 percent for ALTCS applications.
- Increased influenza vaccine rates by 10 percent to incentivize provider administration of the vaccine and partnered with health plans to offer managed care members a $10 gift card for receiving a flu shot.
- Added more than 3,000 members to American Indian Medical Homes, improving care coordination for members served in IHS and 638 facilities. Arizona is the only state in the country to have American Indian Medical Homes.
- Created a Health Equity Committee to examine and understand health disparities that exist within the program and to develop strategies to ensure health equity for all AHCCCS members.
- Partnered with policy makers and hospitals to develop a new assessment, increasing payments to eligible hospitals by $800 million annually.
- Increased rates by an estimated $380 million for dental providers and practitioners.
- Secured more than $37 million in grant funding to address the opioid epidemic, expand the State's suicide prevention work, and meet emergent needs related to the COVID-19 pandemic.

Response to the COVD-19 Public Health Emergency

- Obtained permission to pursue more than 46 programmatic flexibilities from CMS. Key flexibilities implemented include:
  - Expanding the program's telehealth benefit to allow for a broader range of services to be provided electronically.
  - Expediting the provider enrollment process.
  - Reimbursing parents for care offered to their minor children and allowing spouses offering paid care to be paid beyond the standard 40 hours per week limit.
- Offered provider financial relief:
  - Made over $59 million in additional payments to nursing facilities, assisted living facilities, home and community-based service providers, and critical access hospitals.
  - Advanced or accelerated more than $90 million in funding to hospitals, primary care providers, behavioral health outpatient providers, and justice clinic providers who participate in AHCCCS' Targeted Investments Program and hospitals participating in the graduate medical education program.

Other Systemwide Quality Initiatives/Collaboratives[4-14]

SAMHSA SSI/SSDI Outreach, Access, and Recovery[4-15]

Supplemental Security Income/Social Security Disability Insurance (SSI/SSDI) Outreach, Access, and Recovery (SOAR) helps states and communities increase access to Social Security disability benefits for eligible adults and children who are experiencing or are at risk of homelessness and have SMI, medical impairment, and/or a co-occurring substance use disorder. SOAR spotlighted AHCCCS for adding behavioral health support services to its policy manual, broadening access to community mental health programs.

Building State Capacity to Address Behavioral Health Needs Through Crisis Services and Early Intervention

To help ensure patients experiencing a behavioral health crisis are able to get the right care at the right time in the right place, states such as Arizona have developed behavioral health crisis models of care that provide early intervention and divert individuals in crisis from hospitals, jails, and prisons.

Arizona's exemplary crisis system uses a variety of services and settings to meet an individual's immediate needs. These services may include screening, counseling, medication, monitoring, observation, and follow-up to ensure stabilization. Arizona has a "no wrong door" approach to treating behavioral health crises, with a data analytics-enabled call center that navigates callers to appropriate providers, on-call crisis mobile teams that meet people where they are, and partnerships with law enforcement to deliver individuals to open-door observation units in lieu of incarceration.

Approximately 92 percent of calls placed from Arizona to the National Suicide Prevention Lifeline are answered within Arizona, which is the second highest in-state answer rate in the country. When calls are answered within the state's boundaries, the crisis response can be most effective in immediately connecting the caller to the most appropriate crisis interventions.

AHCCCS Receives Leadership in Policy Award for COVID-19 Response

On July 23, Director Jami Snyder accepted the 2020 Leadership in Policy Award from the ASU Center for Applied Behavioral Health Policy.

[4-14] Arizona Health Care Cost Containment System. Awards, Studies, and Highlights. Available at: https://www.azahcccs.gov/AHCCCS/AboutUs/awardsandstudies.html. Accessed on: Mar 11, 2021.
[4-15] Substance Abuse and Mental Health Services Administration. 2020 SOAR Outcomes. Available at: https://www.azahcccs.gov/shared/Downloads/News/2020/2020_SAMHSA_SOAROutcomes.pdf. Accessed on: Mar 11, 2021.

"At the beginning of the pandemic, AHCCCS made two commitments," said Snyder, who accepted the award. "One, ensuring access to care for members during the public health emergency, and two, maintaining the ongoing viability of the provider network."

Dr. Michael Franczak, director of Population Health at Partners in Recovery, presented the award to the AHCCCS leadership team (who attended via webinar), specifically noting the policy changes implemented to address the COVID-19 public health emergency. Reading from the nomination submitted by Mary Jo Whitfield, vice president of behavioral health at Jewish Family & Children's Service, he cited an extensive [sic], including AHCCCS' ability to streamline provider enrollment, change the PASRR assessment process, provide continuous eligibility to enrolled members, waive member premiums and co-pays, provide COVID-19 testing reimbursement, and expand respite care.

Vicki Staples, Director of Outpatient Behavioral Health at Valleywise Health, co-presented the award, noting AHCCCS' extensive efforts to communicate with its stakeholders since the start of the public health emergency. She also highlighted the attention AHCCCS has focused on social determinants of health, how it sought to increase housing for homeless individuals, and how Health Current, the HIE, has been able to improve coordination of care.

Snyder credited AHCCCS employees with their ability to work quickly and collaboratively on behalf of members and providers. "I'm privileged to serve with the qualified and professional experts at AHCCCS, and on behalf of all AHCCCS employees, I thank ASU for this award and for recognizing our efforts," she said.

5. Contractor Best and Emerging Practices

The following are the best practices as reported by the Contractors to AHCCCS.

Banner University Family Care – Long Term Care (BUFC – LTC)

- Diabetes Hemoglobin A1c (HbA1c) Testing: In CYE 2020, BUFC – LTC worked to improve members' A1c testing to detect and address out of control A1c scores. The strategies included coordinating with Sonora Quest to track and monitor A1c tests and values and conduct outreach to those members without a test on record or those with A1c values greater than 9 percent. BUFC – LTC care managers will assist members with high A1c levels (greater than 9) by following up with providers and care givers so interventions can be done quickly to lower the A1c levels. When members' A1c is out of control and they have only received one A1c test, the care managers will work to have the test done more often to ensure the interventions are working and the members are getting in control of their A1cs. This will continue until the A1c levels are in the appropriate range. BUFC – LTC's Clinical Performance team loads quarterly A1c gap-in-care data alerts into the Banner University Health Plans (BUHP) Call Center system (Siebel). The BUHP call center representatives address A1c gap-in-care alerts for dual members via incoming calls and kindly remind members they are due for another A1c test.
- Annual Dental Visit 2–20 Years: BUFC – LTC Quality Department sends out reminder postcards as well as ensures that all dental referrals are attended to. Dental educational materials are also provided through a member newsletter and social media. BUFC – LTC partnered with a dental vendor (DentaQuest) who agreed to notify BUFC – LTC dental providers who have the highest volume of members aligned to their practice. DentaQuest plans to send these providers lists of children with no dental visit within the year and request that they contact and encourage children's parents to get their children in for an appointment. In addition, this dental performance measure was included in the Alternative Payment Model for BUFC – LTC's Value-Based Contracts and appears to be helping increase BUFC – LTC's dental measure performance.
- Breast Cancer Screening: BUFC – LTC sends out annual mailings to all members regarding mammography and the importance of attending to these. BUFC – LTC has implemented additional interventions to educate members on the importance of cancer screenings and assistance with provider scheduling. Further statewide recognition and awareness campaigns regarding other types of cancer screenings may assist in further moving the screenings for those measures. BUFC – LTC has a partnership with the American Cancer Society where they provide BUFC – LTC with cancer screening member and provider material that is then implemented into workflows and key phrases. Moreover, BUFC – LTC has also partnered with Banner Imaging to share lists of members who are due for breast cancer screenings. Banner Imaging conducts monthly outreach and schedules mammograms for dual members. This breast cancer screening measure also formed part of BUFC – LTC's Value-Based Purchasing CY2020 provider agreements.

Mercy Care – Long Term Care (Mercy Care – LTC)

- Community Re-investment Program: Since 2017, Mercy Care's Community Re-Investment (CRI) program focused primarily on offering training opportunities designed to expand and sustain the use of best practices within the provider network. For 2020, Mercy Care – LTC had a focus on expanding best practices including Trauma Focused Cognitive Behavioral Therapy (TF-CBT), Trauma Responsive Strategies for members with Intellectual and/or Developmental Disabilities (I/DD), and Multi-Systemic Therapy (MST).
  - Mercy Care – LTC offered a TF-CBT training for clinicians working with children and families that have I/DD. This was an opportunity to expand and sustain the use of best practices within the provider network, statewide for the I/DD community. Following the training series, consultation calls were used to support providers using TF-CBT in their practice. Consultation included assessment review, clinical case reviews, and feedback on implementation of TF-CBT principles. Consultation is required for clinicians seeking TF-CBT national certification.
  - Mercy Care – LTC developed a workshop, Trauma Responsive Strategies for I/DD Members, focused on understanding trauma and identifying strategies for well-being and emotion-focused communication skills for those caring for individuals with intellectual and developmental disabilities across a variety of settings. This training was selected for paraprofessionals including CMs, direct support workers, family support staff, as well as individuals from the Division of Developmental Disabilities.
  - Mercy Care – LTC's Community Re-Investment also focused this year on expanding MST which is an intensive family and community-based treatment that addresses the multiple causes of serious antisocial behavior in juvenile offenders. Part of the expansion focused on expanding MST for problem sexual behavior (MST-PSB), which is guided by the same principles and uses many of the same evidence-based techniques as in MST for nonsexual offenders but focuses on aspects of the youth's ecology that are functionally related to the problem sexual behavior.
- BHRF Referral Process: The goal of this initiative was to reduce delays in transitioning members to Behavioral Health Residential Facilities (BHRFs) from inpatient, subacute, and community settings. The population identified for this project comprised adult members approved for BHRF placement. This included serious mental illness (SMI) and general mental health substance use (GMHSU) members in all lines of business. Weekly data collection and trending included the number of members approved for BHRF, type of BHRF requested, number of BHRF beds available, and number of members placed. A statewide dashboard was also created of all BHRFs meeting the referral criteria to assist outpatient providers and Mercy Care – LTC staff to identify open beds that met the needs and choice of the member and expedite transition. As a result, there was a 70 percent reduction in members waiting for open beds, increased autonomy and choice for BH providers and their patients, and a database/dashboard of all BHRFs across the State that can be used by health plans, providers, and regulators.
- Pharmacist Clinical Reviews: Two pharmacy clinical review programs used best practices to focus on care coordination among specific medically vulnerable populations.
  - The Medicaid Hospital Readmission Reduction Program (HRRP) focused on coordinating care between providers, case managers (CMs), and clinical pharmacists as members are discharged

from the hospital. Eligibility criteria included members who were admitted and discharged from the hospital for a condition related to an eligible diagnosis; the member had an assigned CM; and the member was on four or more medications for a chronic disease. The pharmacy team provided medication reviews, recommendations, and collaborated with CMs for interventions to improve member safety and adherence. Outreaches were completed by the clinical pharmacist, and communication was provided to the assigned CM. The pharmacy team provided reporting regarding the number of members reviewed and number of recommendations delivered. Pharmacy clinical review metrics were provided monthly to pharmacy directors and CM leadership.

- The Medicaid Pharmacy Supported Comorbid Condition Management (PCCM) Program focused on coordinating care between members, CMs, and clinical pharmacists. The primary goal of the program was to improve medication-related outcomes in complex high-risk members through the completion of a thorough clinical medication review. CMs refer a member to the PCCM Program for any chronic disease state or chronic medication issue that warrants a clinical medication review. The clinical pharmacy advisor completes the medication review and documents findings and drug therapy recommendations and sends the task back to the referring CM within 24 hours of final contact with the member and/or provider. The data analytic pharmacist was responsible for reporting the metrics related to this program which includes the number of members referred, disease states referred to the programs, number and type of quality metrics impacted, and an annual overall financial performance of the program including associated costs and outcomes.

UnitedHealthcare Community Plan – Long Term Care (UHCCP – LTC)

- Internal Mortality Review: UHCCP – LTC developed a standardized process to analyze internally generated unexpected death data for all lines of business to identify potential QOC concerns, and track and trend for opportunities for improvement. Mortality data are obtained from claims data for all members receiving UHCCP – LTC benefits.

  A standard operating procedure (SOP) was developed for review analysis criteria and schedule for reporting to the Mortality Review Committee. A standardized template was created for reporting initial mortality reviews to the Committee. This template is also used to document meeting minutes. The multidisciplinary Mortality Review Committee meets at least 10 times per year. During these committee meetings, potential QOC cases which have been preliminarily reviewed by clinical Quality Management (QM) staff are discussed. A final determination of whether the potential QOC case is a QOC concern will be made by the medical director assigned to the case with input from the Committee.

  All identified QOC concerns are opened and investigated according to UHCCP QM Policy 423 QOC Investigations Peer Review Improvement Action Plans Disciplinary Actions. If it was identified that the unexpected death was due to suicide or associated with opioid/polypharmacy abuse, the QOC concern was reported to AHCCCS through the IAD [Incident/Accident/Death] Portal.
- Silver Alert Monitoring: As a result of a timely identification through a "Silver Alert" of an elopement event in 2018, systemic improvements were implemented. Throughout CYE20, various

members of the UHCCP ALTCS QM team checked the "Silver Alert" website daily to identify individuals who had left alternative residential living facilities. The names were used to identify if, through internal databases and the AHCCCS Eligibility website, the member was receiving UHCCP ALTCS benefits. If the individual was a UHCCP – LTC member, UHCCP case management was contacted. If the UHCCP – LTC member lived in an alternative residential facility, UHCCP QM would speak with UHCCP – LTC case management to obtain information about the facility and if other members were residing there. A health and safety visit would be conducted once the information was gathered, if applicable.

- Diabetes Hemoglobin A1c (HbA1c) Control: The UHCCP QM and LTC departments worked together to improve the HbA1c rates for LTC diabetic members. Targeted interventions were implemented for diabetic members who are in poor control (HbA1c >9%) or who have not had an HbA1c test done during the measurement year. The *Comprehensive Diabetic Care—HbA1c Testing* quality measure is used to identify the members and measure rate improvement. LTC keeps track of all diabetic members on the LTC Diabetic Member Report. LTC case managers have a performance goal to obtain a copy of at least one HbA1c lab for diabetic members. QM and LTC staff meet on a regular basis to share reports, discuss strategy, and exchange information. LTC compared the LTC Diabetic Member Report against members identified in the *CDC02* measure. Based on findings, LTC decided to update the LTC Diabetic Member Report twice a year instead of annually. On an ad hoc basis, QM compares members with gaps in care in the LTC CDC02 report against the LTC A1c Tracking Report to identify HbA1c lab results that could close the gap in care. From August through December 2020, the QM clinical practice consultants (CPCs) asked providers to look up each LTC member with gaps in care for the *CDC02* measure to see if they have an HbA1c lab result under 9 percent. The CPCs tracked the date and the results of the labs, so they are able to retrieve the records if the member is identified in the HEDIS audit sample. If providers do not have an HbA1c lab for the member this year, the CPCs encourage providers to outreach the members and schedule an appointment for them to have a test before the end of the year. If the members' test results are below 9 percent, the CPCs encourage providers to retest the members and provide diabetic education to the members, if indicated. If the member is not engaged with his or her assigned PCP, the CPCs are outreaching the member's attributed providers. LTC members with gaps in care for *CDC02* were sent an at-home A1c test kit in November 2020. The vendor of the testing kit will perform follow-up calls to members who do not return the kits after a specified period. They are [the vendor is] also able to answer questions that members may have about the kit.

Department of Economic Services/Division of Developmental Disabilities (DES/DDD)

- Well-Child Visits: UHCCP – LTC implemented a series of interventions designed to improve the rate for well-child six visits by 15 months of age. Improving preventive care services includes strategies focused on timely identification of members in need of preventive care; determination of members who have received services and current gaps-in-care utilizing claims data, immunization registry, and EPSDT forms; ongoing efforts in place to ensure members adhere to immunization

guidelines and preventive care guidelines; member incentive for receiving preventive care; and strategy for working with the provider network.

- Missed Opportunities Report: In an effort to increase well-care visit rates for children and adolescents, UHCCP – LTC encouraged all providers to take the opportunity to turn sick visits into annual well-care visits whenever possible. When sharing the Missed Opportunities report, the CPCs may also take the opportunity to engage in the following types of discussions with providers and/or staff:
  - Provide an overview of the *AWC [Adolescent Well-Care Visits]* and *W34* measures to providers and/or staff if they are not familiar with the measures.
  - Talk about challenges associated with getting children and adolescents in for annual well-care visits.
  - Discuss how providers can turn sick/other visits into annual well-care visits; how they can use the visit as an opportunity to close these gaps.
  - Conversations about challenges practices may have with turning sick visits into well-care visits. CPCs may explain to providers that UHCCP – LTC contracted providers who are doing well on getting these measures closed are doing so because they are turning sick visits into annual wellness visits; they have managed to figure out a process to do this and have implemented it in their practices.
  - For providers who are not in an ACO or participating in the CP-PCPi [Community Plan-Primary Care Professional Incentive] incentive program, the CPCs may show them their missed opportunities and provide an explanation of the potential financial incentives associated with these measures with participation in the CP-PCPi.
  - For providers participating in the CP-PCPi incentive program, the CPCs may compare the report to the providers' scorecards to show how the "missed opportunities" translated into missed financial incentives.
  - For ACO providers, they may check their Value Based Care (VBC) performance measures to see how these "missed opportunities" translate into dollars and cents.
  - The CPCs may ask providers that do not have a lot of members on the Missed Opportunities report and/or have high *W34* and *AWC* rates what they are doing to be successful in these measures.
  - In CYE 2020, the CPCs shared a handout with providers that imparted practice change tips providers could make to incorporate well-care visits with sick visits. They shared it, along with the Missed Opportunities report, and provided one-to-one education.
- Immunization Gaps: UHCCP – LTC implemented interventions designed to improve the percentage of members who receive immunizations by 2 years of age. In addition to interventions already put into place in CYE 2018, the following two interventions were implemented in the beginning of CYE 2019 and were continued in CYE 2020:
  - Personalized member letters are sent to guardians of members at 13 months and 14 months of age who are noncompliant for their immunizations. The letters encourage guardians to schedule their member's 15-month well child visit and to address the missing immunizations. The letters

provide the names of the member's assigned PCP and list the immunizations the member is missing based on data from ASIIS [Arizona State Immunization Information System].

– Monthly letters are sent to providers listing their assigned members 13 or 14 months of age who are missing one or more immunizations. The letters request that the providers outreach those members and provide the child with the missing immunizations. The provider letter was implemented in October 2018.

6. Performance Measure Results

Methodology

The following section presents the results for the mandatory performance measure activity conducted during the CYE 2019 (October 1, 2018–September 30, 2019) reporting period. To evaluate performance levels and to provide an objective, comparative review of the Contractors' performance. HSAG calculated results on AHCCCS' behalf for a variety of performance measures to address different quality initiatives using the following technical specifications: NCQA's HEDIS, CMS Core Set of Adult Health Care Quality Measures for Medicaid (Adult Core Set), and CMS Core Set of Children's Health Care Quality Measures for Medicaid and CHIP (Child Core Set).

For a detailed explanation of the methodology, please see Appendix A.

Required Performance Measures

The CYE 2019 performance measures selected by AHCCCS for the ALTCS EPD Contractors and DES/DDD were grouped into the following domains of care: Access to Care, Behavioral Health, Medication Management, Pediatric Health, Preventive Screening, and Utilization. While performance is reported primarily at the measure indicator level, grouping these measures into domains encourages the Contractors and AHCCCS to consider the measures as a whole rather than in isolation and to develop strategic changes required to improve overall performance.

Table 6-1 and Table 6-2 display the CYE 2019 performance measures presented within this report; the associated measure specifications used to calculate each measure rate; and the established MPS, if applicable, for the ALTCS EPD Contractors and DES/DDD. An MPS had not been established for all reported performance measure rates.

Table 6-1—CYE 2019 Performance Measures for ALTCS EPD Contractors

Performance Measure	Measure Specification	MPS
Behavioral Health		
Follow-Up After Hospitalization for Mental Illness—7-Day Follow-Up—Total	Adult Core Set	60.0%
Follow-Up After Hospitalization for Mental Illness—30-Day Follow-Up—Total	Adult Core Set	85.0%
Medication Management		
*Use of Opioids at High Dosage in Persons Without Cancer**	Adult Core Set	—
Preventive Screening		
Breast Cancer Screening—Total	Adult Core Set	55.0%

Performance Measure	Measure Specification	MPS
Utilization		
*Ambulatory Care (per 1,000 Member Months)—ED Visits—Total**	HEDIS	73.0
*Diabetes Short-Term Complications Admission Rate (per 100,000 Member Months)—Total**	Adult Core Set	20.0
*Heart Failure Admission Rate (per 100,000 Member Months)—Total**	Adult Core Set	—
Inpatient Utilization—General Hospital/Acute Care—Total—Days per 1,000 Member Months (Total Inpatient)—Total	HEDIS	N/A
Mental Health Utilization—Any Service—Total	HEDIS	N/A
*Plan All-Cause Readmissions—Observed Readmissions—Total**	Adult Core Set	14.0%

— Indicates that an MPS had not been established by AHCCCS.
** A lower rate indicates better performance for this measure. If the measure has a MPS, rates must fall at or below the established MPS in order to exceed the CYE 2019 MPS.*
N/A indicates lower or higher rates are not considered to be an appropriate measure of care for this measure.

Table 6-2—CYE 2019 Performance Measures for DES/DDD

Performance Measure	Measure Specification	MPS
Access to Care		
Annual Dental Visit—2–20 Years	HEDIS	60.0%
Children and Adolescents' Access to Primary Care Practitioners—12–24 Months	Child Core Set	95.0%
Children and Adolescents' Access to Primary Care Practitioners—25 Months–6 Years	Child Core Set	87.0%
Children and Adolescents' Access to Primary Care Practitioners—7–11 Years	Child Core Set	90.0%
Children and Adolescents' Access to Primary Care Practitioners—12–19 Years	Child Core Set	89.0%
Medication Management		
*Use of Opioids at High Dosage in Persons Without Cancer**	Adult Core Set	—
Pediatric Health		
Adolescent Well-Care Visits	Child Core Set	41.0%
Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life	Child Core Set	66.0%
Preventive Screening		
Breast Cancer Screening—Total	Adult Core Set	55.0%
Cervical Cancer Screening	Adult Core Set	30.0%

Performance Measure	Measure Specification	MPS
Utilization		
*Ambulatory Care (per 1,000 Member Months)—ED Visits—Total**	HEDIS	43.0
Inpatient Utilization—General Hospital/Acute Care—Total—Days per 1,000 Member Months (Total Inpatient)—Total	HEDIS	N/A
*Plan All-Cause Readmissions—Observed Readmissions—Total**	Adult Core Set	10.0%

— Indicates that an MPS had not been established by AHCCCS.
** A lower rate indicates better performance for this measure. If the measure has a MPS, rates must fall at or below the established MPS in order to exceed the CYE 2019 MPS.*
N/A indicates lower or higher rates are not considered to be an appropriate measure of care for this measure.

Performance Measure Results—ALTCS EPD Contractors

Table 6-3 presents the CYE 2019 performance measure rates with an MPS for each ALTCS EPD Contractor and the statewide aggregate. Performance measure rate cells shaded green indicate that the Contractor met or exceeded the CYE 2019 MPS established by AHCCCS. Of note, measures for which lower rates suggest better performance are indicated by an asterisk (*). For these measures, rates that fall at or below the established MPS are shaded green.

Table 6-3—CYE 2019 Performance Measure Results—ALTCS EPD Contractors

Performance Measure	BUFC – LTC	Mercy Care – LTC	UHCCP – LTC	Aggregate
Behavioral Health				
Follow-Up After Hospitalization for Mental Illness				
7-Day Follow-Up—Total	50.0%	41.6%	24.4%	36.6%
30-Day Follow-Up—Total	71.1%	64.0%	56.4%	62.4%
Preventive Screening				
Breast Cancer Screening				
Total	NA	37.8%	34.1%	36.5%
Utilization				
Ambulatory Care (per 1,000 Member Months)				
*ED Visits—Total**	68.5	72.2	82.5	74.8
Diabetes Short-Term Complications Admission Rate (per 100,000 Member Months)				
*Days Per 100,000 Member Months—Total**	20.3	17.2	9.6	15.4
Plan All-Cause Readmissions				
*Observed Readmissions—Total**	12.0%	10.9%	11.7%	11.4%

** For this indicator, a lower rate indicates better performance.*
NA indicates that the rate was withheld because the denominator was less than 30.
Cells shaded green indicate that the rate met or exceeded the CYE 2019 MPS established by AHCCCS.

Table 6-4 presents a comparison of the ALTCS EPD Contractors' CYE 2018 to CYE 2019 rates. Performance measure rates were compared to determine if there was a significant difference between CYE 2018 and CYE 2019 using a Chi-square test of proportions. In cases where the value was less than five (i.e., fewer than five members were either numerator positive or numerator negative for either reporting year), a Fisher's exact test was used in place of a Chi-square test. The results of the statistical tests were considered significant when the *p* value was ≤0.05. A green upward arrow (↑) indicates a significant improvement in performance, a red downward arrow (↓) indicates a significant decline in performance, and a dash (—) indicates that the change in performance was not significant.

For some measures, significance testing was not performed because there was a change to the measure specifications and calculation methodology (i.e., *Plan All-Cause Readmissions*) or the measure data were not appropriate for statistical testing (i.e., *Ambulatory Care, Diabetes Short-Term Complications Admission Rate, Heart Failure Admission Rate, Inpatient Utilization,* and *Mental Health Utilization*).

Table 6-4—Trend Analysis From CYE 2018 to CYE 2019—ALTCS EPD Contractors

Performance Measure	BUFC – LTC	Mercy Care – LTC	UHCCP – LTC	Aggregate
Medication Management				
Use of Opioids at High Dosage in Persons Without Cancer				
*Total**	—	—	—	—
Preventive Screening				
Breast Cancer Screening				
Total	NC	—	—	↑
Behavioral Health				
Follow-Up After Hospitalization for Mental Illness				
7-Day Follow-Up—Total	—	—	↓	—
30-Day Follow-Up—Total	—	↑	—	↑

↑ *Indicates a significant improvement in the Contractor's rate from CYE 2018 to CYE 2019.*
↓ *Indicates a significant decline in the Contractor's rate from CYE 2018 to CYE 2019.*
— *Indicates no significant difference in the Contractor's rate from CYE 2018 to CYE 2019.*
NC indicates that a comparison of performance between CYE 2018 and CYE 2019 was not appropriate.

Strengths and Opportunities for Improvement

For CYE 2019, the ALTCS EPD Contractors demonstrated strength for the measure rates within the Utilization domain as all Contractors' rates for *Plan All-Cause Readmissions—Observed Readmissions—Total* met or exceeded the MPS and two of three (66.7 percent) Contractors met or exceeded the MPS for *Ambulatory Care (per 1,000 Member Months)—ED Visits—Total* and *Diabetes Short-Term Complications Admission Rate—Days Per 100,000 Member Months—Total.*

Conversely, all three ALTCS EPD Contractors and the ALTCS EPD aggregate demonstrated opportunities for improvement related to *Follow-Up After Hospitalization for Mental Illness—7-Day*

Follow-Up—Total and *30-Day Follow-Up—Total*, with the reportable performance measure rates falling below the MPS by at least 10 and 13.9 percentage points, respectively. However, Mercy Care – LTC and the ALTCS EPD aggregate demonstrated significant improvement in performance for the *Follow-Up After Hospitalization for Mental Illness—30-Day Follow-Up—Total* measure indicator. Research related to hospitalization for mental illness indicates that appropriate discharge planning and follow-up visits are contributing factors to lowering readmission rates.[6-1] The Reducing Avoidable Readmissions Effectively (RARE) Campaign—a collaboration of the Institute for Clinical Systems Improvement, Minnesota Hospital Association, and Stratis Health—recommends improving care transitions following an inpatient hospital admission by focusing on patient and family engagement, medication management, comprehensive patient-centered transition planning, care transition support, and transition communications. Patients should have follow-up appointments scheduled prior to discharge, and mental health practitioners should ensure availability to review each patient's progress and care plan within the first seven days post discharge.[6-2] Following a member's discharge from an inpatient admission, Contractors should perform a follow-up call with that member within three days to address any questions or concerns and to discuss progress of the care plan.[6-3, 6-4] The ALTCS EPD Contractors should ensure that these follow-up calls are being conducted and confirm during each call that the member has a follow-up visit scheduled with a mental health practitioner, and access to necessary medications, medical equipment, and community resources.

Additionally, two ALTCS EPD Contractors with reportable rates and the ALTCS EPD aggregate demonstrated opportunities for improvement related to *Breast Cancer Screening,* with the reportable performance rates falling below the MPS by at least 17.2 percentage points. However, the ALTCS EPD aggregate demonstrated significant improvement in performance. The ALTCS EPD Contractors should examine potential barriers to women receiving breast cancer screenings and implement multicomponent interventions to reduce structural barriers.

Performance Measure Results—DES/DDD

Table 6-5 presents the CYE 2018 and CYE 2019 performance measure results for DES/DDD. The table displays the following information: CYE 2018 performance, where available; CYE 2019 performance; the relative percentage change between CYE 2018 and CYE 2019 rates, where available; the significance of the relative percentage change, where available; and the AHCCCS MPS, where

[6-1] Lien, Lars. Are readmission rates influenced by how psychiatric services are organized? *Nordic Journal of Psychiatry*. Vol. 56, No. 1, 2002.
[6-2] Reducing Avoidable Readmissions Effectively. *Recommended Actions for Improved Care Transitions: Mental Illness and/or Substance Use Disorders*. Available at: http://www.rarereadmissions.org/documents/Recommended_Actions_Mental_Health.pdf. Accessed on: Apr. 29, 2021.
[6-3] Arizona Health Care Cost Containment System. *How A Hospital Discharge Plan Helps AHCCCS Members Return to Good Health*. Available at: https://www.azahcccs.gov/AHCCCS/Downloads/HospitalDischarge.pdf. Accessed on: Apr. 29, 2021.
[6-4] Arizona Health Care Cost Containment System. *AHCCCS Presentation Care Coordination Discharge Planning*. Available at: http://files.constantcontact.com/b108b018001/a0e54380-8b8a-4cda-abfa-464c2a417bbf.pdf. Accessed on: Apr. 29, 2021.

available. Performance measure rate cells shaded green indicate that DES/DDD met or exceeded the CYE 2019 MPS established by AHCCCS. Of note, measures for which lower rates suggest better performance are indicated by an asterisk (*). For these measures, rates that fall at or below the established MPS are shaded green.

Table 6-5—CYE 2018 and CYE 2019 Performance Measure Results—DES/DDD

Performance Measure	CYE 2018 Performance	CYE 2019 Performance	Relative Percentage Change	Significance Level (*p* value)[1]	MPS
Access to Care					
Annual Dental Visit					
2–20 Years	56.9%	52.7%	-7.4%	***p*<0.001**	60.0%
Children and Adolescents' Access to Primary Care Practitioners					
12–24 Months	100.0%	94.6%	-5.4%	*p*=0.158	95.0%
25 Months–6 Years	87.4%	89.1%	1.9%	***p*=0.035**	87.0%
7–11 Years	92.2%	92.6%	0.5%	*p*=0.418	90.0%
12–19 Years	89.8%	90.2%	0.4%	*p*=0.401	89.0%
Medication Management					
Use of Opioids at High Dosage in Persons Without Cancer[2]					
*Total**	8.9%	4.5%	-48.9%	*p*=0.358	—
Pediatric Health					
Adolescent Well-Care Visits					
Adolescent Well-Care Visits	45.8%	47.7%	4.2%	***p*=0.008**	41.0%
Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life					
Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life	55.2%	57.6%	4.3%	*p*=0.059	66.0%
Preventive Screening					
Breast Cancer Screening					
Total	45.1%	43.7%	-3.1%	*p*=0.533	55.0%
Cervical Cancer Screening					
Cervical Cancer Screening	16.3%	15.9%	-2.2%	*p*=0.656	30.0%
Utilization					
Ambulatory Care (per 1,000 Member Months)					
*ED Visits—Total**	44.0	43.1	-2.1%	—	43.0
Inpatient Utilization—General Hospital/Acute Care (per 1,000 Member Months)—Total[2 †]					
Days per 1,000 Member Months (Total Inpatient)—Total	61.5	60.8	-1.0%	—	—

Performance Measure	CYE 2018 Performance	CYE 2019 Performance	Relative Percentage Change	Significance Level (*p* value)[1]	MPS
Plan All-Cause Readmissions[3]					
*Observed Readmissions—Total**	—	7.4%	—	—	10.0%

** A lower rate indicates better performance for this measure; therefore, an increase in the rate indicates a decline in performance.*
[1] Significance levels (p values) noted in the table were calculated by HSAG on behalf of AHCCCS and demonstrate whether the differences in performance between CYE 2018 and CYE 2019 were statistically significant. The threshold for a result being considered statistically significant is traditionally reached when the p value is ≤0.05. Significance levels (p values) in bold font indicate statistically significant values.
[2] An MPS had not been established for this measure.
[3] Due to changes in the technical specifications for this measure, a break in trending between CYE 2019 and prior years is recommended; therefore, prior years' rates are not displayed, and the relative percentage change is not calculated for this measure.
— Indicates that a comparison of performance between CYE 2018 and CYE 2019 was not possible or appropriate or that an MPS has not been established by AHCCCS.
† Lower or higher rates are not considered to be an appropriate measure of care for this measure.
Cells shaded green indicate that the rate met or exceeded the CYE 2019 MPS established by AHCCCS.

Strengths and Opportunities for Improvement

For CYE 2019, DES/DDD met or exceeded the MPS for five of 11 (45.5 percent) performance measure rates, including four of seven (57.1 percent) rates within the Access to Care and Pediatric Health domains, demonstrating strength. Despite improvement in rates from CYE 2018 to CYE 2019, the performance measure rate for *Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life* fell below the MPS by 8.4 percentage points. CYE 2019 represents the last year the *Adolescent Well-Care Visits* and *Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life* measures are to be reported separately. Beginning in measurement year 2020, these measures will be reported as a combined measure (i.e., *Child and Adolescent Well-Child Visits).* DES/DDD should focus efforts on identifying the barriers to accessing well-child services and implementing improvement strategies to increase well-child and adolescent visits for members.

Conversely, DES/DDD fell below the MPS for both performance measures within the Preventive Screening domain (*Breast Cancer Screening* and *Cervical Cancer Screening*), demonstrating an opportunity to ensure that women receive appropriate screenings. Research shows that women with intellectual and developmental disabilities (IDDs) experience disparities in timely screening for preventive diseases and care; yet, women with IDDs develop cancer at the same rate as the general population.[6-5] Women with IDDs have indicated aversion to mammography and Pap tests due to a general lack of understanding of the procedures, inadequate preparation, and increased anxiety.[6-5,6-6] DES/DDD should focus efforts on identifying the factors contributing to low rates for these measures and implement improvement strategies to increase screenings for breast cancer and cervical cancer.

[6-5] Wilkinson JE, Deis CE, Bowen DJ, et al. w'It's Easier Said Than Done': Perspectives on Mammography From Women With Intellectual Disabilities. *Ann Fam Med.* 2011 Mar; 9(2): 142–147.
[6-6] Parish SL, Swaine JG, Son E, et al. (2013). Determinants of cervical cancer screening among women with intellectual disabilities: Longitudinal evidence from medical record data. *Public Health Reports*. 128, 519-526.

7. Performance Improvement Project Results

One of the four EQR-related activities mandated by the federal Medicaid managed care requirements and described at 42 CFR §438.358(b)(1)(i) is the annual validation, performed by AHCCCS, of Contractors' PIPs underway during the preceding 12 months. In accordance with 42 CFR §438.330, and as required by AHCCCS, Contractors must establish and implement an ongoing comprehensive quality assessment and performance improvement (QAPI) program for the services furnished to members. The QAPI program must focus on clinical and nonclinical areas and include PIPs designed to achieve significant improvement, sustained over time, in health outcomes and member satisfaction. These PIPs must include the following:

- Measurement of performance using objective quality indicators
- Implementation of interventions to achieve improvement in the access to and quality of care
- Evaluation of the effectiveness of interventions based on performance measures
- Planning and initiation of activities to increase and sustain improvement

42 CFR §438.330(d)(3) also requires each Contractor to report the status and results of each PIP no less than once per year.

Conducting the Review

In the AHCCCS Medical Policy Manual, 980—Performance Improvement Projects, AHCCCS mandates that Contractors participate in PIPs selected by AHCCCS. In addition, with AHCCCS approval, Contractors may select and design additional PIPs specific to needs and data identified through internal surveillance of trends. Mandated PIP topics are selected through AHCCCS' analysis of internal and external data and trends that may include Contractor input. AHCCCS considers topics such as comprehensive aspects of enrollee needs, care, and services for a broad spectrum of members or for a focused subset of the population, including those members with special healthcare needs or receiving LTSS.

AHCCCS may mandate that a PIP be conducted by a Contractor or group of Contractors, according to standardized methodology developed by AHCCCS.

Note that AHCCCS initiated and later suspended the *LTSS Assessment and Care Planning* PIP due to the continued efforts around the implementation of HCBS Rules and the impact of the COVID-19 public health emergency. This PIP was replaced with the *Breast Cancer Screening* PIP, initiated in CYE 2019 and detailed later in this section.

Developmental Screening PIP for DES/DDD

In CYE 2016 (October 1, 2015, through September 30, 2016), AHCCCS implemented the *Developmental Screening* PIP for the ACC, CMDP, and DES/DDD lines of business. The CYE 2016 baseline year for this PIP was followed by an "intervention" year in which each Contractor implemented strategies and interventions to improve performance. AHCCCS conducted annual measurements to evaluate Contractor performance, with the first remeasurement reflective of CYE 2018 and the second remeasurement reflective of CYE 2019.

Early identification of developmental delays is important when providing effective interventions. During well-child visits, pediatricians look for potential concerns using both developmental surveillance and discussions with parents about their concerns. If any issues are noted, pediatricians should follow through with a developmental screening. AHCCCS has approved developmental screening tools that should be used for developmental screenings by all participating PCPs who care for EPSDT-age members.

The purpose of the *Developmental Screening* PIP is to increase the number of children screened for risk of developmental, behavioral, and social delays using a standardized screening tool in the 12 months preceding their first, second, or third birthday. AHCCCS' goal is to demonstrate a statistically significant increase in the number and percentage of children receiving a developmental screening, followed by sustained improvement for one year.

The *Contract Year Ending 2020 External Quality Review Annual Report for Arizona Long Term Care System Annual Report* includes CYE 2016 baseline measurement data, CYE 2018 Remeasurement 1 data, Remeasurement 2 data, and percentage change from baseline to Remeasurement 2.

Based on additional review and consideration related to the applicability of the *Developmental Screening* PIP for members previously identified with and enrolled based on an existing intellectual and/or developmental disability, AHCCCS will be closing the *Developmental Screening* PIP for DDD following the CYE 2019 Remeasurement Year 2.

Findings

Table 7-1 presents the baseline, Remeasurement 1 rates, and Remeasurement 2 rates for the *Developmental Screening* PIP for DES/DDD. CYE 2016 was DES/DDD's baseline measurement period for the statewide *Developmental Screening* PIP. CYE 2017 was an intervention year for DES/DDD; therefore, rates will not be reported. CYE 2018 includes Remeasurement 1 rates, and CYE 2019 includes Remeasurement 2 rates. Table 7-1 also includes the relative percent change and statistical significance reflective of CYE 2019 compared to CYE 2016. The data in Table 7-1 indicate that DES/DDD demonstrated modest improvement each year, starting with 24.9 percent of providers conducting a developmental screening during the baseline year, up to 25.1 percent in Remeasurement 1, and up to 25.8 percent in Remeasurement 2. The overall relative percentage change from CYE 2016 to CYE 2019 was 3.6 percent. The PIP did not show statistically significant change.

Table 7-1—*Developmental Screening* PIP DES/DDD Total Rate

PIP Measure	CYE 2016 Baseline	CYE 2018 Remeasurement 1	CYE 2019 Remeasurement 2	Overall Relative Percentage Change[1]	Overall Statistical Significance[1]
Total rate	24.9%	25.1%	25.8%	3.6%	P=.768

[1] The relative percentage change and statistical significance are reflective of CYE 2019 compared to CYE 2016.

Back to Basics PIP for DES/DDD

In CYE 2019 (October 1, 2018, through September 30, 2019), AHCCCS implemented the *Back to Basics* PIP for ACC/KidsCare, CMDP, and DDD populations. The CYE 2019 baseline year for this PIP will be followed by two "intervention" years in which each Contractor will implement strategies and interventions to improve performance. AHCCCS will then conduct annual measurements to evaluate Contractor performance, with the first remeasurement reflective of calendar year (CY) 2022 (January 1, 2022, through December 30, 2022) and the second remeasurement year reflective of CY 2023 (January 1, 2023, through December 30, 2023).

Well-care and annual dental visits for children and adolescents aim to promote optimal health and development. Ensuring that children and adolescents receive regular well-care and dental visits is critical in disease prevention, early detection, and treatment. There are many benefits of well-child/well-care visits, including disease prevention, tracking growth and development, raising concerns, and establishing a team approach to assist with the development of optimal physical, mental, and social health of a child.[7-1] Adolescence is a critical stage of development during which physical, intellectual, emotional, and psychological changes occur.[7-2] Adolescent well-care visits assist with promoting healthy choices and behaviors, preventing risky behaviors, and detecting early the conditions that can inhibit an adolescent's development.

Maintaining good oral health is an essential component in the overall health of infants, children, and adolescents. Oral health addresses several disease prevention and health promotion topics including dental caries, tooth decay, and periodontal health. Tooth decay (or cavities) is one of the most common chronic conditions of childhood in the United States.[7-3] If untreated, tooth decay can lead to pain and infections that cause children and adolescents to experience problems with playing, learning, eating, and speaking.

The purpose of the *Back to Basics* PIP is to increase the number of child and adolescent well-child/well-care visits, as well as increase the number of children and adolescents receiving annual dental visits. The

[7-1] American Academy of Pediatrics. AAP Schedule of Well-Child Care Visits. Available at: https://www.healthychildren.org/English/family-life/health-management/Pages/Well-Child-Care-A-Check-Up-for-Success.aspx. Accessed on: Mar 8, 2021.
[7-2] Centers for Disease Control and Prevention. Adolescence: Preparing for Lifelong Health and Wellness. Available at: https://www.cdc.gov/grand-rounds/pp/2015/20150818-adolescent-wellness.html. Accessed on: Mar 8, 2021.
[7-3] Centers for Disease Control and Prevention. Children's Oral Health, Division of Oral Health. Available at: https://www.cdc.gov/oralhealth/children_adults/child.htm. Accessed on: Mar 8, 2021.

goal is to demonstrate a statistically significant increase in the number and percentage of child and adolescent well-child/well-care visits, as well as a statistically significant increase in the number and percentage of children and adolescents receiving an annual dental visit, followed by sustained improvement for one consecutive year.

CYE 2019 was the baseline measurement period for the *Back to Basics* PIP. Table 7-2, Table 7-3, and Table 7-4 show the indicator, numerator, and denominator that will be used to measure the baseline of this PIP. The DDD CYE 2019 baseline rates are detailed in Table 7-5.

Table 7-2—*Back to Basics* PIP Indicator 1*

PIP Measure Indicator 1	
Indicator 1: Percentage of children who turned 15 months old during the measurement year and who had six or more well-child visits with a primary care practitioner (PCP) during their first 15 months of life.	**Numerator:** The total number of members receiving six or more well-child visits, on different dates of service, with a PCP during their first 15 months of life.
	Denominator: The eligible population.

*Note that Indicator 1 is not reported in this section as it is not applicable to DDD/DES.

Table 7-3—*Back to Basics* PIP Indicator 2

PIP Measure Indicator 2	
Indicator 2: Percentage of children ages 3 years to 21 years who had one or more comprehensive well-care visits with a PCP or an obstetric/gynecologic (OB/GYN) practitioner during the measurement period.	**Numerator:** The total number of members receiving at least one well-care visit with a PCP or OB/GYN during the measurement period.
	Denominator: The eligible population.

Table 7-4—*Back to Basics* PIP Indicator 3

PIP Measure Indicator 3	
Indicator 3: Percentage of children and adolescents ages 2 years to 21 years who received at least one dental visit during the measurement period.	**Numerator:** The total number of members receiving at least one dental visit during the measurement period.
	Denominator: The eligible population.

Table 7-5 presents DDD's baseline rate for each PIP Measure Indicator for the *Back to Basics* PIP.

Table 7-5—*Back to Basics* PIP Baseline Rates

Health Plan	PIP Measure Indicator 1	PIP Measure Indicator 2	PIP Measure Indicator 3
DDD	N/A*	50.7%	52.7%

*Note that Indicator 1 is not reported in this section as it is not applicable to DDD/DES.

Breast Cancer Screening PIP for ALTCS Elderly/Physically Disabled (EPD)

In CYE 2019, AHCCCS implemented a new PIP, *Breast Cancer Screening*, for ALTCS EPD. The baseline measurement period covered CYE 2019 (data from October 1, 2018, through September 30, 2019), and will be followed by two "intervention" years in which each Contractor will implement strategies and interventions to improve performance. AHCCCS will then conduct annual measurements to evaluate Contractor performance, with the first remeasurement reflective of CY 2022 (January 1, 2022, through December 31, 2022) and the second remeasurement year reflective of CY 2023 (January 1, 2023, through December 31, 2023).

AHCCCS implemented the *Breast Cancer Screening* PIP because of the prevalence of breast cancer among women. Breast cancer is the most common female cancer in the United States for every major ethnic group, the second most common cause of cancer death in women,[7-4] and accounts for 15 percent of all new cancer diagnoses in the U.S.[7-5] Ensuring that all women receive regular breast cancer screening is critically important in disease prevention, early detection, and treatment. Breast cancer screening for women is aimed at identifying breast abnormalities as early as possible, and ideally, before warning signs or symptoms are present when the chances of survival are the highest. Even if breast cancer incidences cannot be substantially reduced for some women who are at high risk for developing the disease, the risk of death from breast cancer can be reduced by regular screenings.

The purpose of the *Breast Cancer Screening* PIP is to increase the number and percentage of breast cancer screenings. The goal is to demonstrate a statistically significant increase in the number and percentage of breast cancer screenings followed by sustained improvement for one consecutive year. The eligible population for this PIP includes women, 50 to 74 years of age, who are continuously enrolled with no more than one gap in enrollment of up to 45 days during the measurement period.

CYE 2019 was the baseline measurement period for the ALTCS EPD *Breast Cancer Screening* PIP. Table 7-6 shows the indicator, numerator, and denominator that will be used to measure the baseline of this PIP. ALTCS EPD CYE 2019 baseline rates will be detailed in next year's Annual Report.

[7-4] Jemal A, Siegel R, Ward E, Hao Y, Xu J, Thun MJ. Cancer statistics, 2009. CA Cancer J Clin. 2009 Jul-Aug;59(4):225-49. doi: 10.3322/caac.20006. Epub 2009 May 27. PMID: 19474385.

[7-5] Howlader N, Noone AM, Krapcho M, Miller D, Brest A, Yu M, Ruhl J, Tatalovich Z, Mariotto A, Lewis DR, Chen HS, Feuer EJ, Cronin KA (eds). SEER Cancer Statistics Review, 1975-2016, National Cancer Institute. Bethesda, MD; 2016.

Table 7-6—ALTCS EPD *Breast Cancer Screening* PIP Indicator

PIP Measure Indicator	
Indicator 1: The percentage of women 50–74 years of age who had a mammogram to screen for breast cancer.	Numerator: Number of women who had one or more mammograms any time on or between October 1 two years prior to the measurement year and December 31 of the measurement year.*
	Denominator: The eligible population.

*One or more mammograms any time on or between July 1 two years prior to the measurement year and September 31 of the measurement year for CYE 2019 measurement year only.

8. Organizational Assessment and Structure Performance

In accordance with 42 CFR §438.358, which describes activities related to EQR, a state Medicaid agency; its agent that is not an MCO, PIHP, PAHP, or PCCM entity; or an EQRO must conduct a review within the previous three-year period to determine the Contractor's compliance with state standards set forth in subpart D of 42 CFR §438 and the QAPI requirements described in 42 CFR §438.330. AHCCCS meets the requirement by conducting ORs of its Contractors' performance in complying with federal and AHCCCS' contract requirements, ensuring that it reviews each requirement at least once every three years.

AHCCCS has extensive experience preparing for, conducting, and reporting findings from its reviews of Contractors' compliance with federal and AHCCCS contract requirements. As permitted by 42 CFR §438.358(a), AHCCCS elected to conduct the activities associated with the federal Medicaid managed care mandatory compliance reviews. In accordance with and satisfying the requirements of 42 CFR §438.364, AHCCCS then contracted with HSAG as an EQRO to use the information that AHCCCS obtained from its compliance review activities to prepare this section of the annual EQR technical report.

Conducting the Review

CYE 2019 commenced a new review cycle of ORs for which AHCCCS conducted a comprehensive OR for the ALTCS Contractors, including monitoring the progress of Contractors implementing CAPs for the recommendations from the 2019 OR. AHCCCS did not conduct an OR for the ALTCS Contractors for CYE 2020.

The following sections describe the process that AHCCCS uses to determine whether or not its Contractors meet compliance with federal and AHCCCS' contract requirements. Included in this report are the updates on CAPs issued during the review.

For details on the review objectives, methodologies for conducting and scoring the review, and criteria for requiring Contractors to submit CAPs, please see Appendix C. Validation of Organizational Assessment and Structure Performance Methodology.

Standards

The CYE 2019 OR was organized into 12 areas of focus. For the ALTCS Contractors, each focus area consisted of several elements designed to measure the Contractor's performance and compliance. The following are the 12 focus areas and number of standards involved in each:

- Case Management (CM), 21 standards
- Corporate Compliance (CC), five standards

- Claims and Information Systems (CIS), 10 standards
- Delivery Systems (DS), 14 standards
- General Administration (GA), three standards
- Grievance Systems (GS), 17 standards
- Adult, EPSDT, and Maternal Child Health (MCH), 16 standards
- Medical Management (MM), 27 standards
- Member Information (MI), 10 standards
- Quality Management (QM), 22 standards
- Reinsurance (RI), four standards
- Third-Party Liability (TPL), eight standards

Contractor-Specific Results

For CYE 2019, AHCCCS conducted an OR for 12 focus areas for each Contractor. Contractor-specific results are presented in the *CYE 2019 External Quality Review Annual Report for Arizona Long Term Care System (ALTCS) Contractors*. Contractor-specific CAP results are presented below.

Outstanding CAPs From Plans With ORs in CYE 2019

Banner University Family Care LTC (BUFC – LTC)

Corrective Action Plans

The results of the CYE 2019 OR demonstrated opportunities for improvement as BUFC – LTC was less than fully compliant in eight of the 12 focus areas reviewed. In the report generated from BUFC – LTC's CYE 2019 OR, AHCCCS included recommendations for BUFC – LTC that required the submission of 43 CAPs.

BUFC – LTC submitted CAPs for the CM, CIS, DS, GS, MCH, MM, MI, and QM focus areas, with proposed activities to correct the deficiencies. On May 29, 2019, AHCCCS accepted some but not all proposed CAPs. On July 9, 2019, AHCCCS accepted and/or closed all CAPs that BUFC – LTC had resubmitted and informed BUFC – LTC that AHCCCS must see demonstrated progress in the proposed steps until it agrees that BUFC – LTC has addressed the findings for the 40 CAPs that remained open. With few exceptions, AHCCCS expected that all CAP steps be completed within six months.

The six-month CAP update submission was received by AHCCCS on January 9, 2020. AHCCCS is in the process of determining whether the CAPs that had remained open may be closed. The review of these CAPs has been delayed due to the COVID-19 public health emergency. To close the CAPs that remain open for CM, MCH, MI, and QM standard areas, BUFC – LTC was required to reassess the CAPs and

provide a six-month CAP update resubmission. In the update resubmission, BUFC – LTC was required to submit additional information evidencing that policies, manuals, desktop procedures, and other vital documents were updated, and processes were enhanced and monitored appropriately to come into compliance with the requirements.

Mercy Care – LTC (Mercy Care – LTC)

Corrective Action Plans

The results of the CYE 2019 OR demonstrated opportunities for improvement as Mercy Care – LTC was less than fully compliant in seven of the 12 focus areas reviewed. In the report generated from Mercy Care – LTC's CYE 2019 OR, AHCCCS included recommendations that required the submission of 36 CAPs.

Mercy Care – LTC submitted CAPs for the CM, CIS, DS, MCH, MM, QM, and TPL focus areas, with proposed activities to correct the deficiencies. On August 14, 2019, AHCCCS accepted some but not all proposed CAPs. On September 16, 2019, AHCCCS accepted and/or closed all CAPs that Mercy Care – LTC had resubmitted and informed Mercy Care – LTC that AHCCCS must see demonstrated progress in the proposed steps until it agrees that Mercy Care – LTC has addressed the findings for the 28 CAPs that remained open. With few exceptions, AHCCCS expected that all CAP steps be completed within six months.

The six-month CAP update submission was received by AHCCCS on August 28, 2020; and on September 16, 2020, AHCCCS accepted the CAPs that remained open. To close the CAP for the CM, DS, MCH, MM, QM, and TPL standards, Mercy Care – LTC was required to submit additional information evidencing that policies, manuals, desktop procedures, and other vital documents were updated, and processes were enhanced and monitored to come into compliance with the requirements.

UnitedHealthcare Community Plan – LTC (UHCCP – LTC)

Corrective Action Plans

The results of the CYE 2019 OR demonstrated opportunities for improvement as UHCCP – LTC was less than fully compliant in seven of the 12 focus areas reviewed. In the report generated from UHCCP – LTC's CYE 2019 OR, AHCCCS included recommendations for UHCCP – LTC that required the submission of 40 CAPs.

UHCCP – LTC submitted CAPs for the CM, CIS, DS, MCH, MM, MI, and QM focus areas, with proposed activities to correct the deficiencies. On June 27, 2019, AHCCCS accepted some but not all proposed CAPs. On August 12, 2019, AHCCCS accepted and/or closed all CAPs that UHCCP – LTC had resubmitted and informed UHCCP – LTC that AHCCCS must see demonstrated progress in the proposed steps until it agrees that UHCCP – LTC has addressed the findings for the MCH, MM, MI, and

QM standard areas that were only accepted in part. With few exceptions, AHCCCS expected that all CAP steps be completed within six months.

The six-month CAP update submission was received by AHCCCS on February 11, 2020, and UHCCP – LTC provided a response to include additional information evidencing that policies, manuals, desktop procedures, and other vital documents were updated, and processes were enhanced and monitored to come into compliance with the requirements.

Opportunities for Improvement and Recommendations

Since a comprehensive OR had been completed in CYE 2019 for the ALTCS Contractors, AHCCCS needed to review the CAPs in CYE 2020. Following the CYE 2019 ORs, AHCCCS did not accept any of the ALTCS Contractors' first CAP submissions. As a result, HSAG makes to ALTCS Contractors the following general recommendations regarding ORs:

- Contractors should conduct internal reviews of operational systems to identify barriers that affect compliance with AHCCCS standards, State rules, and federal regulations. Specifically, Contractors should cross-reference existing policies, procedures, and information distributed to providers, subcontractors, and members with AHCCCS requirements and ensure, at a minimum, alignment with both the intent and content of AHCCCS standards, State rules, and federal regulations.
- Contractors should regularly monitor and ensure that updates are made to contracts with providers and that policy manual updates from AHCCCS are also included in a timely manner in Contractors' policies, procedures, and manuals (if impacted by the updates). Contractors should ensure that communications to all areas directly and indirectly impacted by these updates (including Contractor staff, providers, subcontractors, and members) are provided and documented. In addition, Contractors should assess current monitoring processes and activities to identify strengths and opportunities for improvement within operational processes. When deficiencies are noted, the Contractors should develop mechanisms to address such areas and enhance existing procedures. In addition, Contractors should implement periodic assessments of those elements reviewed by AHCCCS for which Contractors are found deficient.

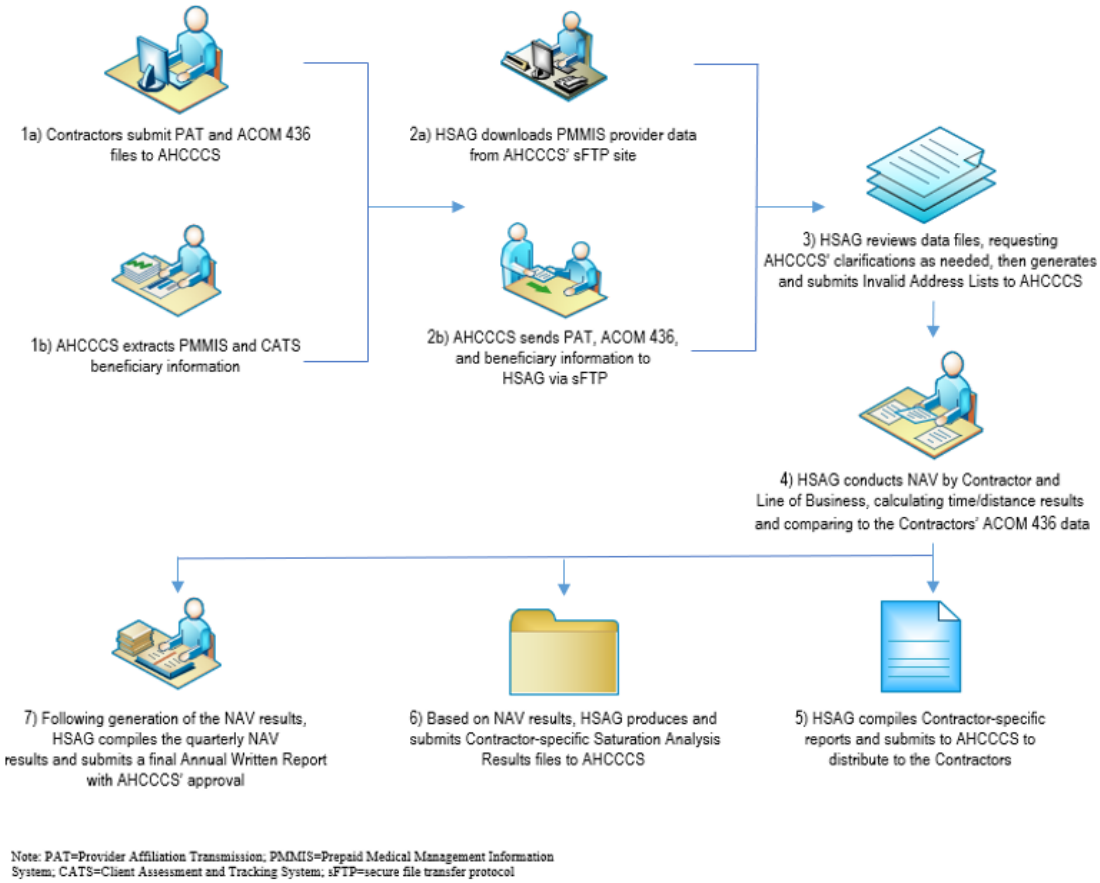
Based on AHCCCS' review of the ALTCS Contractors' performance in the comprehensive OR in CYE 2019 and the subsequent CAP submissions, HSAG recommends the following:

- AHCCCS should consider distributing technical assistance documents to all Contractors and holding meetings with Contractors who scored lowest in the ALTCS OR standards, including guidance on how to complete a CAP.
- AHCCCS should consider using the quarterly meetings with Contractors as forums in which to share lessons learned from both the State and Contractor perspectives. AHCCCS should present identified best practices on the predominant issues for ALTCS Contractors' issues and facilitate a group discussion on Contractors' policies and procedures. In addition, AHCCCS should consider conducting a root cause analysis with the Contractors to determine why they continue to have difficulty complying with specific standards.

9. Network Adequacy Update

CYE 2020 is the second year in which AHCCCS contracted HSAG to support quarterly analysis and validation of healthcare provider networks subcontracted to AHCCCS' ALTCS Contractors.[9-1] HSAG's quarterly NAV considered each ALTCS EPD Contractor's compliance with 12 AHCCCS-established time/distance standards during the July 1, 2019, through June 30, 2020, measurement period and each ALTCS DD Contractor's compliance with 11 AHCCCS-established time/distance standards during the October 1, 2019, through June 30, 2020, measurement period.[9-2] Figure 9-1 summarizes the quarterly network adequacy data process and reporting products.

Figure 9-1—CYE 2020 Quarterly Network Adequacy Validation Process



Note: PAT=Provider Affiliation Transmission; PMMIS=Prepaid Medical Management Information System; CATS=Client Assessment and Tracking System; sFTP=secure file transfer protocol

[9-1] Validation of network adequacy is a mandatory EQR activity, and states must begin conducting this activity, described in CMS rule 438.358(b)(1)(iv), no later than one year from the issuance of the associated EQR protocol. While the protocol was not released during this study, HSAG's analysis of the Contractor's time/distance results aligns with current federal regulations.

[9-2] The AHCCCS Contractors Operations Manual (ACOM), Section 436—Network Standards defines time/distance standards, as well as provider identification and beneficiaries' county assignment criteria. The ACOM is available at: https://www.azahcccs.gov/shared/Downloads/ACOM/PolicyFiles/400/436_Network_Standards.pdf.

In addition to HSAG's NAV activities, AHCCCS measures network adequacy using other mechanisms outlined in Appendix D.

HSAG conducted quarterly validation between the ALTCS Contractors' self-reported ACOM 436 results and HSAG's time/distance calculations for all Contractors in each quarter that data could be compared. AHCCCS suspended the CYE 2020 Quarter 2 ACOM 436 data reporting during the COVID-19 public health emergency, and Contractors' ACOM 436 results were not available for comparison to HSAG's CYE 2020 Quarter 2 time/distance calculation results.

ALTCS EPD

HSAG's quarterly validation of the ALTCS Contractors' results reflect minor discrepancies between the Contractors' self-reported ACOM 436 results and HSAG's time/distance calculations for all Contractors in each quarter that data could be compared. While minor differences (i.e., less than 1 percentage point) between HSAG's time/distance calculation results and each Contractor's time/distance calculation results were common, these findings are most likely attributable to the timing of the input data, software version used by each Contractor (refer to Table D-3), or a small number of beneficiaries eligible for inclusion in time/distance calculations for the standard and county.

Table 9-2 summarizes HSAG's assessment of each ALTCS EPD Contractor's compliance with AHCCCS' minimum time/distance network standards. A check mark indicates that the ALTCS EPD Contractor met the minimum network standard for each Arizona county during each of the four quarterly assessments, and an "X" indicates that the ALTCS EPD Contractor failed to meet one or more minimum network standards in any county or quarter. Appendix D contains NAV results specific to each county and quarterly validation period.

Table 9-2—Summary of ALTCS EPD Contractors' CYE 2020 Compliance With Minimum Time/Distance Network Requirements

Minimum Network Requirement	BUFC – LTC	Mercy Care – LTC	UHCCP – LTC
Behavioral Health Outpatient and Integrated Clinic, Adult	✗	✔	✔
Behavioral Health Outpatient and Integrated Clinic, Pediatric	✗	✔	✔
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	✗	✔	✔
Cardiologist, Adult	✔	✔	✔
Cardiologist, Pediatric	✔	✔	✔
Dentist, Pediatric	✔	✔	✗
Hospital	✗	✔	✔

Minimum Network Requirement	BUFC – LTC	Mercy Care – LTC	UHCCP – LTC
Nursing Facility	✗	✓	✗
Obstetrics/Gynecology (OB/GYN)	✓	✓	✓
Pharmacy	✗	✓	✓
PCP, Adult	✓	✓	✓
PCP, Pediatric	✓	✓	✓

While Mercy Care – LTC met all minimum time/distance network requirements in all applicable counties and quarters, Mercy Care – LTC only serves ALTCS EPD beneficiaries in the Central Region (i.e., Gila, Maricopa, and Pinal counties) and Pima County, where provider networks are typically robust due to the Phoenix and Tucson metropolitan areas and key cities serving surrounding rural areas (e.g., Casa Grande, Florence, Globe, Maricopa, Marana, and Payson).

Isolated data issues may have contributed to specific instances affecting ALTCS EPD Contractors' compliance with time/distance standards. Specific examples include the following:

- BUFC – LTC's CYE 2020 PAT submissions for Quarters 2 and 3included extremely reduced numbers of provider records measured for adult and pediatric behavioral health outpatient and integrated clinics, behavioral health residential facilities, hospitals, and nursing facilities for its ALTCS EPD program. BUFC – LTC researched the decrease and determined the error was in the submission of its Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission.
- Mercy Care – LTC's CYE 2020 Quarter 1 ACOM 436 result for the ALTCS EPD adult behavioral health outpatient and integrated clinics did not include the entire network of providers available for beneficiaries residing in Gila County. Its PAT data file contained the applicable providers; therefore, HSAG's time/distance calculation results accurately reflected the adult behavioral health outpatient and integrated clinics provider locations available to Mercy Care – LTC's ALTCS EPD beneficiaries.
- UHCCP – LTC's significantly underreported the number of provider locations for the pediatric dentist in its CYE 2020 Quarter 3 PAT file significantly underreported the number of provider locations for pediatric dentists. This omission impacted the validation of UHCCP – LTC's ACOM 436 results in all counties. Additionally, UHCCP – LTC also reported a slight decrease in the number of nursing facilities in each quarter which affected its compliance in CYE 2020 Quarters 1 and 2 for Coconino County.

As part of the NAV, AHCCCS maintained its feedback process for ALTCS EPD Contractors to review and improve the accuracy of their data submissions. Specifically, AHCCCS supplied each ALTCS EPD Contractor with a copy of HSAG's quarterly network adequacy analysis, a copy of the PAT file that HSAG used to conduct the analysis, and a copy of HSAG's saturation analysis results. When issues were identified, ALTCS EPD Contractors were expected to research the instances and make corrections for future PAT data and/or ACOM 436 submissions.

Recommendations

Each ALTCS EPD Contractor should continue to monitor and maintain its existing provider network, based on the following validation conclusions:

- BUFC – LTC identified the error in the submission of its CYE 2020 Quarter 2 and Quarter 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. As such, BUFC – LTC should continue to review quarterly PAT data files for accuracy prior to submitting the files to AHCCCS.
- As of CYE 2020 Quarter 3, Mercy Care – LTC met all standards and did not receive saturation analysis results.
- UHCCP – LTC failed to meet the pediatric dentist standard for all applicable counties in CYE 2020 Quarter 3 and should review the validation results from AHCCCS to identify and address any concerns with its PAT data file.

ALTCS DD

Table 9-3 summarizes HSAG's assessment of each ALTCS DD subcontractor's compliance with AHCCCS' minimum time/distance network standards. A check mark indicates that the ALTCS DD subcontractor met the minimum network standard for each Arizona county during each of the three quarterly assessments, and an "X" indicates that the ALTCS DD subcontractor failed to meet one or more minimum network standards in any county or quarter. Appendix D contains NAV results specific to each county and quarterly validation period.

Table 9-3—Summary of ALTCS DD Subcontractors' CYE 2020 Compliance With Minimum Time/Distance Network Requirements

Minimum Network Requirement	Mercy Care – DD*	UHCCP – DD*
Behavioral Health Outpatient and Integrated Clinic, Adult	✗	✗
Behavioral Health Outpatient and Integrated Clinic, Pediatric	✗	✗
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	✓	✓
Cardiologist, Adult	✗	✗
Cardiologist, Pediatric	✗	✗
Dentist, Pediatric	✗	✗
Hospital	✓	✓
Obstetrics/ Gynecology (OB/GYN)	✓	✓

Minimum Network Requirement	Mercy Care – DD*	UHCCP – DD*
Pharmacy	✔	✕
PCP, Adult	✕	✕
PCP, Pediatric	✔	✕

**Mercy Care – LTC and UHCCP – LTC were subcontractors for some NAV activities for DES/DDD.*

The ALTCS DD subcontractors met all minimum time/distance network requirements during all quarters in Cochise, Maricopa, Pima, Pinal, Santa Cruz, Yavapai, and Yuma counties. However, both ALTCS DD subcontractors did not consistently meet minimum time/distance network requirements in Greenlee County for pediatric dentists and in Apache County for adult and pediatric behavioral health outpatient and integrated clinics, adult and pediatric cardiologists, pediatric dentists, and PCPs for adults. Additionally, overall network compliance results were influenced by the limited number of beneficiaries in time/distance calculations for selected provider types, counties, and quarters.

As part of the NAV, AHCCCS maintained its feedback process for ALTCS DD subcontractors to review and improve the accuracy of their data submissions. Specifically, AHCCCS supplied each ALTCS DD subcontractor with a copy of HSAG's quarterly network adequacy analysis, a copy of the PAT file that HSAG used to conduct the analysis, and a copy of HSAG's saturation analysis results. When issues were identified, ALTCS DD subcontractors were expected to research the instances and make corrections for future PAT data and/or ACOM 436 submissions.

Recommendations

As of CYE 2020 Quarter 3, Mercy Care – DD met all minimum time/distance network standards during all three quarters in Cochise, Maricopa, Pima, Pinal, Santa Cruz, Yavapai, and Yuma counties. Mercy Care – DD should continue to monitor and maintain its existing provider networks while working to assure the availability of:

- Behavioral Health Outpatient and Integrated Clinics for adults in Apache and Coconino counties.
- Cardiologists for adults in Apache and Coconino counties.
- Pediatric dentists in Gila, Apache, Graham, Greenlee, and La Paz counties.[9-3]
- PCPs for adults in Apache and Coconino counties.

As of CYE 2020 Quarter 3, UHCCP – DD met all minimum time/distance network standards during all three quarters in all counties except Apache and Greenlee counties. UHCCP – DD failed to meet the pharmacy network standard for all three quarters and failed to meet the pediatric PCP standard for two

[9-3] These results may be influenced by the limited number of beneficiaries in the time/distance calculations for selected counties and quarters.

quarters in Apache County. UHCCP – DD should continue to monitor and maintain its existing provider network while working to assure the availability of:

- Behavioral Health Outpatient and Integrated Clinics for adults or children in Apache County.
- Cardiologists for adults or children in Apache County.
- Pediatric dentists in Apache and Greenlee counties.
- PCPs for adults in Apache County.
- Pharmacies in Apache County.

Appendix A. Validation of Performance Measure Methodology and Additional Results

In accordance with 42 CFR §438.240(b), AHCCCS requires Contractors to have a Quality Management/Performance Improvement (QM/PI) program that includes measuring and submitting data to AHCCCS related to Contractor performance. Validating MCO and PIHP performance measures is one of the three mandatory EQR activities described at 42 CFR §438.358(b)(2). The requirement §438.358(a) allows states, their agents that are not MCOs or PIHPs, or an EQRO to conduct the mandatory activities. MCOs/PIHPs may report performance results to a state (as required by the state), or the state may calculate the MCOs'/PIHPs' performance on the measures for the preceding 12 months. Performance must be reported by the MCOs/PIHPs—or calculated by the state—and validated annually.

As permitted by 42 CFR §438.358(a), AHCCCS elected to conduct the functions associated with the mandatory activity of validating performance measures. In accordance with and satisfying the requirements of 42 CFR §438.364(a)(1–5), AHCCCS contracted with HSAG as an EQRO to use the information that AHCCCS obtained from the performance measure calculations and data validation activities to prepare this CYE 2020 annual report.

Conducting the Review

HSAG calculates and reports rates on AHCCCS' behalf for a variety of Contractor-specific and statewide aggregate performance measures to address different quality initiatives. HSAG calculated the measure rates for CYE 2019.

Using the results and statistical analysis of Contractors' performance measure rates, HSAG organized, aggregated, and analyzed the performance data. From the analysis, HSAG was able to draw conclusions about Contractor-specific and statewide aggregate performance related to the quality of, access to, and timeliness of care and services provided to AHCCCS members for CYE 2019.

Objectives for Conducting the Review

As part of its objectives to measure, report, compare, and continually improve Contractor performance, AHCCCS conducted the following activities:

- Provided key information about AHCCCS-selected performance measures to each Contractor.
- Collected Contractor data for use in calculating performance measure rates.

Methodology for Conducting the Review

For the CYE 2019 (October 1, 2019–September 30, 2019) reporting period, AHCCCS conducted the following activities:

- Collected Contractor encounter data associated with each state-selected measure.
- Contracted with HSAG to calculate Contractor-specific and program aggregate rates for each performance measure.
- Reported Contractor performance results by individual Contractor and a program aggregate.
- Compared Contractor performance rates with the MPS defined by AHCCCS' contract, if available.

CAPs, key components of the AHCCCS Quality Strategy, are used as foundational elements to improve performance measure rates that fall below the contractual MPS. During CYE 2020, AHCCCS required Contractors to propose and implement CAPs for CYE 2018 performance measures that did not meet the MPS. The Contractors then submitted CAP proposals. Once a CAP proposal is submitted to and approved by AHCCCS, the Contractors implement the CAP and are required to provide CAP updates as required by AHCCCS.

HSAG calculated results on AHCCCS' behalf for a variety of performance measures to address different quality initiatives using the following technical specifications: NCQA's HEDIS, CMS Adult Core Set, and CMS Child Core Set. The Contractors' performance rates were calculated for AHCCCS-selected measures using administrative data collected from the automated managed care data system known as the Prepaid Medical Management Information System (PMMIS). NCQA and CMS update their respective methodologies annually to add new codes to better identify the eligible populations and/or services being measured or to delete codes retired from standardized coding sets used by providers.

HSAG analyzed Contractor-specific and program aggregate performance results for each measure to determine if performance rates met or exceeded each corresponding AHCCCS MPS. Relative rate changes and statistical analyses are presented to show the magnitude and direction of any change in rates from the previous measurement period and whether that change was significant.

Using the performance rates that HSAG calculated on AHCCCS' behalf, HSAG organized, aggregated, and analyzed the data to draw conclusions about Contractor performance related to providing quality, timely, and accessible care and services to AHCCCS members. (See Table A-1 for the assignment of performance measures with an MPS to the Quality, Timeliness, and Access areas.) When applicable, HSAG formulated and presented recommendations to improve Contractor performance rates.

Table A-1—Assignment of Performance Measures With an MPS to the Quality, Timeliness, and Access Areas

Performance Measure	Quality	Timeliness	Access
Access to Care			
Annual Dental Visit			✓
Children and Adolescents' Access to Primary Care Practitioners			✓

Performance Measure	Quality	Timeliness	Access
Behavioral Health			
Follow-Up After Hospitalization for Mental Illness—7-Day Follow-Up—Total and *30-Day Follow-Up—Total*	✓	✓	✓
Pediatric Health			
Adolescent Well-Care Visits	✓		
Well-Child Visits in the Third, Fourth, Fifth, and Sixth Years of Life	✓		
Preventive Screening			
Breast Cancer Screening—Total	✓		
Cervical Cancer Screening	✓		
Utilization			
Ambulatory Care (per 1,000 Member Months)—ED Visits—Total	N/A	N/A	N/A
Plan All-Cause Readmissions—Observed Readmissions—Total	✓		
Diabetes Short-Term Complications Admission Rate (per 100,000 Member Months)—Total			✓
Heart Failure Admission Rate (per 100,000 Member Months)—Total			✓

N/A indicates not applicable.

Performance Measures Results—ALTCS EPD Contractors

The following tables include performance measure results for the ALTCS EPD Contractors. The tables display the following information: CYE 2018 performance, where available; CYE 2019 performance; the relative percentage change between CYE 2018 and CYE 2019 rates, where available; the significance of the relative percentage change, where available; and the AHCCCS MPS, where available. Performance measure rate cells shaded green indicate that performance met or exceeded the CYE 2019 MPS established by AHCCCS. Of note, measures for which lower rates suggest better performance are indicated by an asterisk (*). For these measures, rates that fall at or below the established MPS are shaded green.

Banner University Family Care – Long Term Care (BUFC – LTC)

Table A-2—CYE 2018 and CYE 2019 Performance Measure Results—BUFC – LTC

Performance Measure	CYE 2018 Performance	CYE 2019 Performance	Relative Percentage Change	Significance Level (*p* value)[1]	MPS
Behavioral Health					
Follow-Up After Hospitalization for Mental Illness					
7-Day Follow-Up—Total	33.3%	50.0%	50.0%	*p*=0.138	60.0%
30-Day Follow-Up—Total	61.5%	71.1%	15.5%	*p*=0.377	85.0%
Medication Management					
Use of Opioids at High Dosage in Persons Without Cancer					
*Total**	23.2%	19.1%	-17.9%	*p*=0.324	—
Preventive Screening					
Breast Cancer Screening					
Total	NA	NA	—	—	55.0%
Utilization					
Ambulatory Care (per 1,000 Member Months)					
*ED Visits—Total**	62.6	68.5	9.5%	—	73.0
Diabetes Short-Term Complications Admission Rate (per 100,000 Member Months)					
*Days Per 100,000 Member Months—Total**	13.3	20.3	52.5%	—	20.0
Heart Failure Admission Rate (per 100,000 Member Months)					
*Days Per 100,000 Member Months—Total**	169.0	189.0	11.8%	—	—
Inpatient Utilization—General Hospital/Acute Care (per 1,000 Member Months)—Total†					
Days per 1,000 Member Months (Total Inpatient)—Total	245.8	292.6	19.0%	—	—
Mental Health Utilization†					
Any Service—Total	22.6%	25.7%	13.7%	—	—
Plan All-Cause Readmissions[2]					
*Observed Readmissions—Total**	—	12.0%	—	—	14.0%

** A lower rate indicates better performance for this measure; therefore, an increase in the rate indicates a decline in performance.*

[1] Significance levels (p values) noted in the table were calculated by HSAG on behalf of AHCCCS and demonstrate whether the differences in performance between CYE 2018 and CYE 2019 were statistically significant. The threshold for a result being considered statistically significant is traditionally reached when the p value is ≤0.05. Significance levels (p values) in bold font indicate statistically significant values.

[2] Due to changes in the technical specifications for this measure, a break in trending between CYE 2019 and prior years is recommended; therefore, prior years' rates are not displayed, and the relative percentage change is not calculated for this measure.

— Indicates that the CYE 2018 rate was not displayed due to technical specification changes, that a comparison of performance between CYE 2018 and CYE 2019 was not possible, or that an MPS had not been established by AHCCCS.

† Lower or higher rates are not considered to be an appropriate measure of care for this measure.

NA indicates that the rate was withheld because the denominator was less than 30.

Cells shaded green indicate that the rate met or exceeded the CYE 2019 MPS established by AHCCCS.

Mercy Care – Long Term Care (Mercy Care – LTC)

Table A-3—CYE 2018 and CYE 2019 Performance Measure Results—Mercy Care – LTC

Performance Measure	CYE 2018 Performance	CYE 2019 Performance	Relative Percentage Change	Significance Level (*p* value)[1]	MPS
Behavioral Health					
Follow-Up After Hospitalization for Mental Illness					
7-Day Follow-Up—Total	28.9%	41.6%	44.0%	*p*=0.069	60.0%
30-Day Follow-Up—Total	48.5%	64.0%	32.2%	***p*=0.032**	85.0%
Medication Management					
Use of Opioids at High Dosage in Persons Without Cancer					
*Total**	22.8%	21.9%	-4.1%	*p*=0.712	—
Preventive Screening					
Breast Cancer Screening					
Total	36.9%	37.8%	2.4%	*p*=0.649	55.0%
Utilization					
Ambulatory Care (per 1,000 Member Months)					
*ED Visits—Total**	68.2	72.2	5.9%	—	73.0
Diabetes Short-Term Complications Admission Rate (per 100,000 Member Months)					
*Days Per 100,000 Member Months—Total**	10.7	17.2	60.7%	—	20.0
Heart Failure Admission Rate (per 100,000 Member Months)					
*Days Per 100,000 Member Months—Total**	174.8	233.7	33.7%	—	—
Inpatient Utilization—General Hospital/Acute Care (per 1,000 Member Months)—Total†					
Days per 1,000 Member Months (Total Inpatient)—Total	306.9	323.9	5.6%	—	—
Mental Health Utilization †					
Any Service—Total	23.1%	24.8%	7.6%	—	—
Plan All-Cause Readmissions[2]					
*Observed Readmissions—Total**	—	10.9%	—	—	14.0%

** A lower rate indicates better performance for this measure; therefore, an increase in the rate indicates a decline in performance.*

[1] Significance levels (p values) noted in the table were calculated by HSAG on behalf of AHCCCS and demonstrate whether the differences in performance between CYE 2018 and CYE 2019 were statistically significant. The threshold for a result being considered statistically significant is traditionally reached when the p value is ≤0.05. Significance levels (p values) in bold font indicate statistically significant values.

[2] Due to changes in the technical specifications for this measure, a break in trending between CYE 2019 and prior years is recommended; therefore, prior years' rates are not displayed, and the relative percentage change is not calculated for this measure.

— Indicates that the CYE 2018 rate was not displayed due to technical specification changes, that a comparison of performance between CYE 2018 and CYE 2019 was not possible or appropriate, or that an MPS had not been established by AHCCCS.

† Lower or higher rates are not considered to be an appropriate measure of care for this measure.

Cells shaded green indicate that the rate met or exceeded the CYE 2019 MPS established by AHCCCS.

UnitedHealthcare Community Plan – Long Term Care (UHCCP – LTC)

Table A-4—CYE 2018 and CYE 2019 Performance Measure Results—UHCCP – LTC

Performance Measure	CYE 2018 Performance	CYE 2019 Performance	Relative Percentage Change	Significance Level (*p* value)[1]	MPS
Behavioral Health					
Follow-Up After Hospitalization for Mental Illness					
7-Day Follow-Up—Total	45.5%	24.4%	-46.4%	***p*=0.011**	60.0%
30-Day Follow-Up—Total	52.7%	56.4%	7.0%	*p*=0.674	85.0%
Medication Management					
Use of Opioids at High Dosage in Persons Without Cancer					
*Total**	17.6%	12.7%	-27.9%	*p*=0.098	—
Preventive Screening					
Breast Cancer Screening					
Total	32.6%	34.1%	4.5%	*p*=0.587	55.0%
Utilization					
Ambulatory Care (per 1,000 Member Months)					
*ED Visits—Total**	77.6	82.5	6.3%	—	73.0
Diabetes Short-Term Complications Admission Rate (per 100,000 Member Months)					
*Days Per 100,000 Member Months—Total**	9.5	9.6	1.8%	—	20.0
Heart Failure Admission Rate (per 100,000 Member Months)					
*Days Per 100,000 Member Months—Total**	180.0	250.0	38.9%	—	—
Inpatient Utilization—General Hospital/Acute Care (per 1,000 Member Months)—Total†					
Days per 1,000 Member Months (Total Inpatient)—Total	279.6	308.5	10.3%	—	—
Mental Health Utilization†					
Any Service—Total	23.1%	25.9%	12.4%	—	—
Plan All-Cause Readmissions[2]					
*Observed Readmissions—Total**	—	11.7%	—	—	14.0%

** A lower rate indicates better performance for this measure; therefore, an increase in the rate indicates a decline in performance.*

[1] Significance levels (p values) noted in the table were calculated by HSAG on behalf of AHCCCS and demonstrate whether the differences in performance between CYE 2018 and CYE 2019 were statistically significant. The threshold for a result being considered statistically significant is traditionally reached when the p value is ≤0.05. Significance levels (p values) in bold font indicate statistically significant values.

[2] Due to changes in the technical specifications for this measure, a break in trending between CYE 2019 and prior years is recommended; therefore, prior years' rates are not displayed, and the relative percentage change is not calculated for this measure.

— Indicates that the CYE 2018 rate was not displayed due to technical specification changes, that a comparison of performance between CYE 2018 and CYE 2019 was not possible or appropriate, or that an MPS had not been established by AHCCCS.

† Lower or higher rates are not considered to be an appropriate measure of care for this measure.

Cells shaded green indicate that the rate met or exceeded the CYE 2019 MPS established by AHCCCS.

ALTCS EPD Contractors Aggregate

Table A-5—CYE 2018 and CYE 2019 Performance Measure Results—ALTCS EPD Contractors

Performance Measure	CYE 2018 Performance	CYE 2019 Performance	Relative Percentage Change	Significance Level (*p* value)[1]	MPS
Behavioral Health					
Follow-Up After Hospitalization for Mental Illness					
7-Day Follow-Up—Total	34.6%	36.6%	5.9%	*p*=0.673	60.0%
30-Day Follow-Up—Total	52.4%	62.4%	19.3%	***p*=0.042**	85.0%
Medication Management					
Use of Opioids at High Dosage in Persons Without Cancer					
*Total**	21.3%	18.5%	-13.2%	*p*=0.111	—
Preventive Screening					
Breast Cancer Screening					
Total	34.0%	36.5%	7.5%	***p*=0.049**	55.0%
Utilization					
Ambulatory Care (per 1,000 Member Months)					
*ED Visits—Total**	69.9	74.8	7.0%	—	73.0
Diabetes Short-Term Complications Admission Rate (per 100,000 Member Months)					
*Days Per 100,000 Member Months—Total**	10.9	15.4	41.3%	—	20.0
Heart Failure Admission Rate (per 100,000 Member Months)					
*Days Per 100,000 Member Months—Total**	175.1	228.9	30.7%	—	—
Inpatient Utilization—General Hospital/Acute Care (per 1,000 Member Months)—Total†					
Days per 1,000 Member Months (Total Inpatient)—Total	284.4	311.5	9.5%	—	—
Mental Health Utilization†					
Any Service—Total	22.9%	25.3%	10.6%	—	—
Plan All-Cause Readmission[2]					
*Observed Readmissions—Total**	—	11.4%	—	—	14.0%

** A lower rate indicates better performance for this measure; therefore, an increase in the rate indicates a decline in performance.*

[1] Significance levels (p values) noted in the table were calculated by HSAG on behalf of AHCCCS and demonstrate whether the differences in performance between CYE 2018 and CYE 2019 were statistically significant. The threshold for a result being considered statistically significant is traditionally reached when the p value is ≤0.05. Significance levels (p values) in bold font indicate statistically significant values.

[2] Due to changes in the technical specifications for this measure, a break in trending between CYE 2019 and prior years is recommended; therefore, prior years' rates are not displayed, and the relative percentage change is not calculated for this measure.

— Indicates that the CYE 2018 rate was not displayed due to technical specification changes, that a comparison of performance between CYE 2018 and CYE 2019 was not possible or appropriate, or that an MPS had not been established by AHCCCS.

† Lower or higher rates are not considered to be an appropriate measure of care for this measure.

Cells shaded green indicate that the rate met or exceeded the CYE 2019 MPS established by AHCCCS.

Appendix B. Validation of Performance Improvement Project Methodology

Performance Improvement Project Design

AHCCCS' PIPs, either mandated or Contractor-initiated, are developed according to 42 CFR §438.330, QAPI Program. AHCCCS requires Contractors to conduct PIPs that focus on both clinical and nonclinical areas. AHCCCS designs PIPs to correct significant system problems and/or achieve significant improvement in health outcomes and member satisfaction. Improvements need to be sustained over time through the measurement of performance using objective quality indicators, implementation, and evaluation of interventions to achieve improvement in access to and quality of care, and planning and initiation of activities for increasing or sustaining improvement.

AHCCCS' clinical focus topics may include primary, secondary, and/or tertiary prevention of acute, chronic, or behavioral health conditions; care of acute, chronic, or behavioral health conditions; high-risk services; and continuity and coordination of care.

AHCCCS' nonclinical focus topics may include availability, accessibility, and adequacy of the Contractors' service delivery systems; cultural competency of services; interpersonal aspects of care; and appeals, grievances, and other complaints.

Data Collection Methodology

AHCCCS' evaluation of the Contractors' performance on the selected measures is based on systematic, ongoing collection and analysis of accurate, valid, and reliable data, as collected, and analyzed by AHCCCS. The Contractors' methodology (including project indicators, procedures, and timelines) aligns with the guidance and direction provided for all AHCCCS-mandated PIPs. The Contractors are required to include internal rates and results used as the basis for analysis (both quantitative and qualitative) and selection/modification of interventions, within the Contractors' annual PIP report submissions. Depending on the PIP, AHCCCS may direct Contractors to collect all or some of the data used to measure performance. In such cases, AHCCCS requires that the Contractors have qualified personnel collect data and ensure interrater reliability if more than one person is collecting and entering data. Contractors must submit specific documentation to verify that indicator criteria were met.

Measurement of Significant Improvement

AHCCCS expects Contractors to implement interventions to meet a benchmark level of performance for any PIP. AHCCCS defines this benchmark level in advance for all AHCCCS-mandated PIPs. The Contractors must initiate interventions that result in significant improvement, sustained over time, in their performance for the quality indicators being measured. AHCCCS requires that improvement be

evidenced in repeated measurements of the quality indicators specified for each PIP undertaken by the Contractors.

AHCCCS determines a Contractor has demonstrated significant improvement when the Contractor achieves any one of the following three conditions:

- Meets or exceeds the AHCCCS overall average for the baseline measurement, if its baseline rate was below the average and the increase is statistically significant.
- Demonstrates a statistically significant increase, if its baseline rate was at or above the AHCCCS overall average for the baseline measurement.
- Demonstrates the highest-performing (benchmark) plan in any remeasurement and maintains or improves its rate in a successive measurement.

AHCCCS determines a Contractor has demonstrated sustained improvement when the Contractor achieves both of the following conditions:

- Establishes how the significant improvement can be reasonably attributable to interventions implemented by the Contractor (i.e., improvement occurred due to the project and its interventions, not another unrelated reason).
- Maintains, or increases, the improvements in performance for at least one year after the improvement in performance was first achieved.

Performance Improvement Project Time Frames

AHCCCS-mandated PIPs begin on a date that corresponds with a contract year. Baseline data for the PIP are collected and analyzed at the beginning of the PIP. Depending on the PIP topic, AHCCCS may provide baseline data by Contractor and include additional data by age, race, sex, ethnicity, and/or geographic area to assist Contractors in refining interventions. During the first year of the PIP, AHCCCS requires the Contractors to implement interventions to improve performance based on an evaluation of barriers to care/use of services and evidence-based approaches to improving performance. An intervention may consider any unique factors, such as a Contractor's membership, provider network, or geographic area(s) served.

AHCCCS requires Contractors to use the plan-do-study-act (PDSA) method to test changes (interventions) quickly and refine them, as necessary. AHCCCS expects that Contractors will implement this process in as short a time frame as is practical, based on the PIP topic. Contractors are expected to use several PDSA cycles within the PIP lifespan and include the PDSA in the annual and final PIP report submissions.

AHCCCS will conduct annual measurements to evaluate Contractor performance and may conduct interim measurements, depending on the resources required, to collect and analyze data. Contractors must include internal annual measurements/rates and results, used as the basis for analysis (both

quantitative and qualitative) and selection/modification of interventions, within the Contractors' annual PIP report submissions.

AHCCCS requires Contractors' participation in the PIP to continue until demonstration of significant and sustained improvement is shown, as outlined above.

Appendix C. Validation of Organizational Assessment and Structure Performance Methodology

Objectives for Conducting the Review

AHCCCS' objectives for conducting ORs are to:

- Determine if the Contractor satisfactorily met AHCCCS' requirements as specified in its contract, AHCCCS policies, Arizona Revised Statutes, the Arizona Administrative Code (AAC), and Medicaid managed care regulations (42 CFR §438).
- Increase AHCCCS' knowledge of the Contractor's operational encounter processing procedures.
- Provide technical assistance and identify areas in which the Contractor can improve as well as areas of noteworthy performance and accomplishments.
- Review the Contractor's progress in implementing recommendations that AHCCCS made during prior ORs.
- Determine if the Contractor complied with its own policies and evaluate the effectiveness of those policies and procedures.
- Perform oversight of the Contractor as required by CMS in accordance with AHCCCS' 1115 waiver.
- Provide information to HSAG as AHCCCS' EQRO to use in preparing this report as described in 42 CFR §438.364.

Methodology for Conducting the Review

While AHCCCS reviews the operational and financial performance of the Contractors throughout the year, it also conducts formal reviews on a schedule that ensures it monitors all applicable CMS and AHCCCS contract requirements at least once every three years. AHCCCS follows a CMS-approved process to conduct the ORs that is also consistent with CMS' protocol for EQROs that conduct the reviews.[C-1]

AHCCCS' methodology for conducting the OR included the following:

- Reviewing activities that AHCCCS conducted to assess the Contractor's performance
- Reviewing documents and deliverables that the Contractor was required to submit to AHCCCS
- Conducting interviews with key Contractor administrative and program staff

[C-1] Department of Health and Human Services, Centers for Medicare & Medicaid Services. *Protocol 3. Review of Compliance With Medicaid and CHIP Managed Care Regulations: A Mandatory EQR-Related Activity*, October 2019. Available at: https://www.medicaid.gov/medicaid/quality-of-care/downloads/2019-eqr-protocols.pdf. Accessed on: Mar 11, 2021.

AHCCCS conducts activities following the review that include documenting and compiling the results of the review, preparing the draft report of findings, and issuing the draft report to the Contractor for review and comment. In the report, each focus area and standard is individually listed with the applicable performance designation based on AHCCCS' review findings and assessment of the degree to which the Contractor complied with the standards.

AHCCCS' review team members included employees of the Division of Health Care Management (DHCM) in Medical and Case Management, Operations, Quality Management, Quality Improvement, Finance and Reinsurance, the Division of Budget and Finance (DBF), Office of Administrative Legal Services, and Office of Inspector General (OIG).

As needed throughout the preparation of this report, AHCCCS clarified any remaining questions regarding the accuracy and completeness of the data and information that HSAG would use to prepare this section of the EQR report. Using the verified results that AHCCCS obtained from conducting the OR, HSAG organized and aggregated the performance data for each Contractor. HSAG then analyzed the data by focus area.

Based on its analysis, HSAG identified strengths and opportunities for improvement for each Contractor. When HSAG identified opportunities for improvement, HSAG also included the associated AHCCCS recommendations to further improve the quality and timeliness of, and access to the care and services each Contractor provided to AHCCCS members.

Scoring Methodology

Each focus area consists of several standards designed to measure the Contractor's performance and compliance with the federal managed care rules and the AHCCCS ALTCS contract provisions. A Contractor may receive up to a maximum possible score of 100 percent for each standard. Within each standard are specific scoring detail criteria worth defined percentages of the standard's total possible score.

AHCCCS includes the percentages awarded for each scoring detail in the standard's total score. Using the sum of all applicable standard total scores, AHCCCS then develops an overall focus area score. In addition, a standard is scored *Not Applicable (N/A)* if it does not apply to the Contractor and/or no instances exist in which the requirement is applied.

Corrective Action Statements

As part of the AHCCCS methodology, each Contractor receives a report containing review findings. The Contractor has the opportunity to respond to AHCCCS concerning any disagreements related to the findings. AHCCCS reviews and responds to any Contractor disagreements based on review of the Contractor information, then revises the report if necessary. AHCCCS issues the final report to the Contractor, describing the findings, scores, and required CAPs.

Contractors must complete a CAP for any standard for which the total score is less than 95 percent. The report, based on the review and the findings, may contain one of the three following statements:

- *The Contractor must* …. This statement indicates a critical noncompliant area that must be corrected as soon as possible to comply with the AHCCCS contract.
- *The Contractor should* …. This statement indicates a noncompliant area that must be corrected to comply with the AHCCCS contract but is not critical to the day-to-day operation of the Contractor.
- *The Contractor should consider* …. This statement is a suggestion by the review team to improve the operations of the Contractor but is not directly related to contract compliance.

Appendix D. Validation of Network Adequacy Methodology and Detailed Results

HSAG used data supplied by AHCCCS to calculate the number and percent of ALTCS EPD and ALTCS DD beneficiaries within a defined time or distance from up to 12 types of AHCCCS-defined providers. As Table D-1 describes, these time/distance standards vary by provider type and county, and some standards may not apply to every Contractor.

Table D-1—Time/Distance Network Standards for AHCCCS Contractors by Provider Type and Geography

Provider Type	Beneficiary Population	Network Standard Maricopa and Pima Counties	Network Standard All Other Arizona Counties
Behavioral Health Outpatient and Integrated Clinic, Adult	Beneficiaries aged 18 years and older	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 60 miles
Behavioral Health Outpatient and Integrated Clinic, Pediatric	Beneficiaries younger than 18 years	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 60 miles
Behavioral Health Residential Facility[1]	All beneficiaries	90 percent of beneficiaries within 15 minutes or 10 miles	Not Applicable
Cardiologist, Adult	Beneficiaries aged 21 years and older	90 percent of beneficiaries within 30 minutes or 20 miles	90 percent of beneficiaries within 75 minutes or 60 miles
Cardiologist, Pediatric	Beneficiaries younger than 21 years	90 percent of beneficiaries within 60 minutes or 45 miles	90 percent of beneficiaries within 110 minutes or 100 miles
Dentist, Pediatric	Beneficiaries younger than 21 years	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 40 minutes or 30 miles
Hospital	All beneficiaries	90 percent of beneficiaries within 45 minutes or 30 miles	90 percent of beneficiaries within 95 minutes or 85 miles
Nursing Facility[2]	All beneficiaries currently residing in their own home	90 percent of beneficiaries within 45 minutes or 30 miles	90 percent of beneficiaries within 95 minutes or 85 miles
Obstetrics/Gynecology (OB/GYN)	Female beneficiaries aged 15 to 45 years	90 percent of beneficiaries within 45 minutes or 30 miles	90 percent of beneficiaries within 90 minutes or 75 miles
Pharmacy	All beneficiaries	90 percent of beneficiaries within 12 minutes or 8 miles	90 percent of beneficiaries within 40 minutes or 30 miles
PCP, Adult	Beneficiaries aged 21 years and older	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 40 minutes or 30 miles
PCP, Pediatric	Beneficiaries younger than 21 years	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 40 minutes or 30 miles

1. Applies only to Maricopa and Pima counties.
2. Applies only to ALTCS – EPD Contractors.

Data Sources

For each quarterly measurement period, AHCCCS supplied HSAG with the following data files:

1. Prepaid Medical Management Information System (PMMIS) provider data—Data files maintained by AHCCCS that list all AHCCCS-registered providers and their corresponding addresses.
2. AHCCCS beneficiary data—A data file compiled by AHCCCS from the PMMIS and Client Assessment and Tracking System (CATS) data.
   a. PMMIS data elements include the addresses and pertinent demographic information for AHCCCS beneficiaries.[D-1]
   b. CATS data elements identify AHCCCS beneficiaries that live in their own home, for calculation of the Nursing Facility time/distance standard.
   c. Data elements identifying DDD contractor enrollment.
3. Provider Affiliation Transmission (PAT) file—One data file listing each Contractor's contracted providers, and two data files representing contracted providers for each of DDD's subcontractors.
4. ACOM Policy 436 (ACOM 436) submission—A Microsoft (MS) Excel workbook with a tab listing the AHCCCS and DDD contractor quarterly results for compliance with county-level time/distance standards.
   a. AHCCCS did not require Contractors to submit CYE 2020 Quarter 2 ACOM 436 data reporting due to the COVID-19 public health emergency.

Table D-2 shows the effective dates for the data files supplied to HSAG in each quarter.

Table D-2—Effective Dates for AHCCCS-Supplied Network Adequacy Data by Quarter and Data Type

Data Source	CYE 2019 Quarter 4	CYE 2020 Quarter 1	CYE 2020 Quarter 2	CYE 2020 Quarter 3
Measurement Period	July 1, 2019 – September 30, 2019	October 1, 2019 – December 31, 2019	January 1, 2020 – March 31, 2020	April 1, 2020 – June 30, 2020
PMMIS Providers	Data as of November 21, 2019	Data as of January 9, 2020	Data as of April 2, 2020	Data as of July 9, 2020
AHCCCS Beneficiaries	Active Enrollment as of October 1, 2019	Active Enrollment as of January 1, 2020	Active Enrollment as of April 1, 2020	Active Enrollment as of July 1, 2020
Contractor-Specific PAT Providers	Due to AHCCCS on October 15, 2019	Due to AHCCCS on January 15, 2020	Due to AHCCCS on April 15, 2020	Due to AHCCCS on July 15, 2020

[D-1] Prior to conducting analyses, HSAG assigned beneficiaries to counties consistent with AHCCCS' ACOM 436 requirements, including county reassignments for beneficiaries residing in the following AHCCCS-specific ZIP Codes, updated May 2019: beneficiaries residing in ZIP Codes 85120, 85140, 85142, 85143, and 85190 are assigned to Maricopa County; beneficiaries residing in ZIP Code 85135 are assigned to Gila County; and beneficiaries residing in ZIP Codes 85542, 85192, and 85550 are assigned to Graham County.

Data Source	CYE 2019 Quarter 4	CYE 2020 Quarter 1	CYE 2020 Quarter 2	CYE 2020 Quarter 3
Contractor-Specific ACOM 436 Submissions	Due to AHCCCS on October 15, 2019	Due to AHCCCS on January 15, 2020	Reporting Waived by AHCCCS*	Due to AHCCCS on July 15, 2020

* AHCCCS suspended the CYE 2020 Quarter 2 ACOM 436 data reporting during CYE 2020 Quarter 2 in response to the COVID-19 public health emergency.

Study Indicators

The quarterly, Contractor-specific analysis of network adequacy includes study indicators from three analytic domains:

1. **Time/Distance Calculation**: HSAG's calculation of results for all applicable AHCCCS-established time/distance standards by Contractor, line of business, and county, using beneficiary and PAT data.
   - Study indicators show the percent of beneficiaries assigned by AHCCCS to the specified county, with access to any provider location serving the line of business within the time/distance standard.
2. **Time/Distance Validation**: Validation of each Contractor's compliance with the time/distance standards, based on HSAG's time/distance calculation results from #1 above.
   - Study indicators validate each Contractor's reported compliance with each time/distance standard applicable to the line of business and county.
     - A score of "*met*" indicates that HSAG's time/distance results show a percentage of beneficiaries at or above the time/distance standard.
     - A score of "*not met*" indicates that HSAG's time/distance results show a percentage of beneficiaries below the time/distance standard.
     - The value "*NA*" identifies standards not applicable to the line of business and/or geography.
     - The value "*NR*" identifies standards for which no beneficiaries met the network requirement denominator for the line of business and geography; therefore, HSAG calculated no corresponding time/distance result.
   - Study indicators also consider the degree to which HSAG's time/distance results align with the time/distance values reported in each Contractor's ACOM 436 submission.
     - Shaded cells in the Findings tables identify notable differences between each Contractor's ACOM 436 time/distance calculation results and HSAG's results for all quarters except CYE 2020 Q2.
3. **Provider Saturation Analysis**: HSAG's assessment of the degree to which each Contractor's provider network reflects available AHCCCS-contracted providers.
   - Study indicators include the number of AHCCCS-contracted provider locations not reflected in each Contractor's quarterly PAT file for each applicable time/distance standard scored as *"not met."*

Analytic Process

HSAG used the Quest Analytics Suite software, version 2019.3 (Quest) to geocode the PAT and PMMIS addresses for beneficiaries and providers, assigning each address to an exact geographic location (i.e., latitude and longitude). To facilitate geocoding, HSAG standardized beneficiary and provider address data to align with the United States Postal Service Coding Accuracy Support System (USPS CASS) to ensure consistent address formatting across data files.

HSAG assembled the geocoded beneficiary (PMMIS) and provider (PAT) addresses into datasets that were used with Quest to calculate the percentage of beneficiaries meeting the time/distance standards described in Table D-1. Quarterly county-specific time/distance calculations were conducted separately for each line of business and excluded less than 1 percent of beneficiaries and providers with addresses that could not be geocoded or were geocoded to non-neighboring states. HSAG's time/distance calculations considered the driving time/distance between a beneficiary and the nearest provider location (i.e., the time or distance for the beneficiary to reach the provider using established roadways). Driving time calculations assumed 30 miles per hour (MPH) for Maricopa and Pima counties and 55 MPH for all other counties.

To assess the validity of each ALTCS Contractor's quarterly ACOM 436 submission, HSAG compared the time/distance results calculated from the PMMIS and PAT data against the quarterly ACOM 436 time/distance results submitted to AHCCCS by each ALTCS EPD and ALTCS DD Contractor. Quarterly analyses reflect the measurement periods defined in Table D-2.

Analytic Considerations

AHCCCS does not define the software or process by which each ALTCS Contractor calculates the quarterly ACOM 436 time/distance results. HSAG uses Quest to calculate time/distance results based on driving distances, and additional discrepancies may result if Contractors use different versions of Quest during each of the different data network validations.[D-2] Table D-3 describes each ALTCS Contractor's self-reported methods for calculating the ACOM 436 results, as of January 2020.

Table D-3—AHCCCS Contractors' ACOM 436 Calculation Methods

Contractor	ACOM 436 Calculation Method
BUFC – LTC	Calculates time/distance results based on driving distances using Quest version 2019.3
Mercy Care – LTC	Calculates time/distance results based on driving distances using Quest version 2019.3
UHCCP – LTC	Calculates time/distance results based on driving distances using Quest version 2019.3

[D-2] AHCCCS' beneficiary address data may not always reflect a beneficiary's place of residence (e.g., use of post office boxes), or be identifiable with mapping software (e.g., addresses reflecting local place designations, rather than street addresses). While mapping software may assign beneficiaries to geographic coordinates, these coordinates may not align with the beneficiary's exact residential location for records that do not use a standard street address.

AHCCCS beneficiaries may seek care from network providers practicing outside of the beneficiary's county of residence. As such, HSAG considered all applicable provider locations within a line of business when calculating time/distance results. However, HSAG's time/distance calculations included all available provider locations noted in Contractors' PAT data files, without considering potential barriers to new patient acceptance or appointment availability at individual provider locations.

Additionally, HSAG's time/distance calculations did not include some facilities available to American Indian beneficiaries enrolled with an ALTCS Contractor. American Indian beneficiaries, Title XIX and Title XXI, on- or off-reservation, and eligible to receive services, may choose to receive services at any time from an American Indian Health Facility, IHS Facility, a Tribally-Operated 638 Health Program, or an Urban Indian Health Program (I/T/U) (American Reinvestment and Recovery Act of 2009 [ARRA] Section 5006(d), and State Medicaid Director Letter [SMDL] 10-001). These facilities are not included in the calculations in this report. As a result, beneficiary access may be under-reported, particularly in areas with high concentrations of these facilities.

Similarly, HSAG's validation included time/distance standards that do not reflect all potential healthcare needs or service delivery options for AHCCCS' ALTCS beneficiaries. Selected time/distance standards may be addressed through telehealth, mobile service providers, mail delivery for prescriptions, or other emerging service delivery approaches that may be evaluated using metrics other than time/distance calculation results.

Detailed Validation of Network Adequacy Results

ALTCS EPD

Table D-4 presents the total AHCCCS ALTCS EPD beneficiary enrollment for each county as of July 1, 2020 (i.e., the day after the end of the CYE 2020 Quarter 3 measurement period). The total numbers represent all Contractors with ALTCS EPD beneficiaries residing in the county.

Table D-4—AHCCCS' ALTCS EPD Beneficiary Enrollment by County, as of July 1, 2020

County	ALTCS EPD Beneficiary Enrollment
Apache	89
Cochise	621
Coconino	233
Gila	257
Graham and Greenlee[D-3]	120

[D-3] Due to Health Insurance Portability and Accountability Act (HIPAA) requirements, enrollment data reported for Graham and Greenlee counties has been combined.

County	ALTCS EPD Beneficiary Enrollment
La Paz	44
Maricopa	18,074
Mohave	1,026
Navajo	272
Pima	4,536
Pinal	925
Santa Cruz	306
Yavapai	1,051
Yuma	922

Table D-5 presents the counts of ALTCS EPD Contractors' provider locations[D-4] identified for each time/distance network standard for CYE 2020 Quarter 3 (i.e., the April 1, 2020–June 30, 2020 measurement period).

Table D-5—Summary of ALTCS EPD Providers by Time/Distance Network Standard and Contractor, CYE 2020 Quarter 3

Minimum Network Requirement	Count of BUFC – LTC Provider Locations*	Count of Mercy Care – LTC Provider Locations	Count of UHCCP – LTC Provider Locations
Behavioral Health Outpatient and Integrated Clinic, Adult	27	455	483
Behavioral Health Outpatient and Integrated Clinic, Pediatric	27	455	483
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	15	259	225
Cardiologist, Adult	1,111	1,714	2,205
Cardiologist, Pediatric	1,220	1,907	2,415
Dentist, Pediatric	2,581	610	4
Hospital	13	124	118

[D-4] The number of provider locations contributing to time/distance calculation results is a function of contractor's PAT data quality and integrity; the presence of multiple physical locations for an individual provider may cause the appearance of a greater number of provider locations than physically exist. Since HSAG is unable to identify which PAT provider locations would be appropriate to exclude from analyses, all active provider locations are reflected in the network adequacy results. These data limitations may impact the validity of HSAG's time/distance results, and the magnitude of the impact may vary by provider type and county.

Minimum Network Requirement	Count of BUFC – LTC Provider Locations*	Count of Mercy Care – LTC Provider Locations	Count of UHCCP – LTC Provider Locations
Nursing Facility *(Only ALTCS EPD Contractors)*	1	101	82
Obstetrics/Gynecology (OB/GYN)	1,207	2,180	3,891
Pharmacy	1,081	964	806
PCP, Adult	14,965	26,534	50,113
PCP, Pediatric	12,245	22,125	40,830

* During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records measured under Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS program. BUFC – LTC researched the decrease and determined the error was in the submission of its Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. During this submission, BUFC – LTC identified 426 unique Outpatient and Integrated Clinics (Adult and Pediatric), 240 Behavioral Health Residential Facilities, 158 Hospitals, and 117 Nursing Facilities in its ALTCS EPD network. BUFC – LTC reports these numbers are more indicative of the network available to its members during Quarters 2 and 3. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

ALTCS DD

Table D-6 presents the total AHCCCS ALTCS DD beneficiary enrollment for each county as of July 1, 2020 (i.e., the day after the end of the CYE 2020 Quarter 3 measurement period). The total numbers represent all Contractors with ALTCS DD beneficiaries residing in the county.

Table D-6—AHCCCS' ALTCS DD Beneficiary Enrollment by County, as of July 1, 2020

County	ALTCS DD Beneficiary Enrollment
Apache	127
Cochise	509
Coconino	493
Gila	219
Graham	173
Greenlee	46
La Paz	36
Maricopa	24,136
Mohave	746
Navajo	320
Pima	4,952
Pinal	1,336
Santa Cruz	242

County	ALTCS DD Beneficiary Enrollment
Yavapai	987
Yuma	808

Table D-7 presents the counts of ALTCS DD subcontractors' provider locations[D-5] identified for each time/distance network standard for CYE 2020 Quarter 3 (i.e., the April 1, 2020–June 30, 2020 measurement period).

Table D-7 —Summary of ALTCS DD Providers by Time/Distance Network Standard and Contractor, CYE 2020 Quarter 3

Minimum Network Requirement	Count of Mercy Care – LTC Provider Locations	Count of UHCCP – LTC Provider Locations
Behavioral Health Outpatient and Integrated Clinic, Adult	460	584
Behavioral Health Outpatient and Integrated Clinic, Pediatric	460	584
Behavioral Health Residential Facility *(only Maricopa and Pima counties)*	219	266
Cardiologist, Adult	1,718	2,308
Cardiologist, Pediatric	1,912	2,520
Dentist, Pediatric	613	2,982
Hospital	116	129
Obstetrics/ Gynecology (OB/GYN)	2,195	3,988
Pharmacy	1,009	810
PCP, Adult	26,607	53,615
PCP, Pediatric	22,215	44,019

This section presents quarterly validation findings specific to the ALTCS EPD line of business, with one results table for each of the following counties by region:

1. Central Region: Gila, Maricopa, Pinal
2. North Region: Apache, Coconino, Mohave, Navajo, Yavapai
3. South Region: Cochise, Graham,[D-6] Greenlee, La Paz, Pima, Santa Cruz, Yuma

[D-5] The number of provider locations contributing to time/distance calculation results is a function of contractor's PAT data quality and integrity; the presence of multiple physical locations for an individual provider may cause the appearance of a greater number of provider locations than physically exist. Since HSAG is unable to identify which PAT provider locations would be appropriate to exclude from analyses, all active provider locations are reflected in the network adequacy results. These data limitations may impact the validity of HSAG's time/distance results, and the magnitude of the impact may vary by provider type and county.

[D-6] Graham County includes the 85542, 85192, and 85550 ZIP Codes representing the San Carlos Tribal area; these ZIP Codes are physically located in Gila or Pinal County.

Each county-specific table summarizes quarterly validation results containing the percent of beneficiaries meeting each time/distance standard by quarter and Contractor, with color-coding to identify whether the time/distance standard was *"met"* or *"not met."*

The value, "NA," is shown for time/distance standards that do not apply to the county or ALTCS EPD line of business.

The value, "NR," is shown for time/distance standards in which no beneficiaries met the network requirement denominator for the ACC line of business and county; therefore, HSAG calculated no corresponding time/distance result.

Yellow color-coding identifies instances in which HSAG's time/distance results differed from the Contractor's ACOM 436 results, but still met the minimum network requirement. Yellow color-coding does not appear for time/distance results for CYE 2020 Quarter 2, as AHCCCS suspended Contractors' ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

Red color-coding identifies instances in which HSAG's time/distance results that did not meet the compliance standard, regardless of the Contractor's ACOM 436 results.

An asterisk (*) identifies instances in which fewer than five beneficiaries were included in the denominator of HSAG's time/distance results.

Central Region: Gila, Maricopa, and Pinal Counties

Tables for the Central Region begin on Page D-11.

Table D-8—ALTCS EPD Time/Distance Validation Results for Gila County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	BUFC – LTC†				Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	100.0	50.3	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0*	100.0*	100.0*	0.0*	100.0*	100.0*	100.0*	100.0*	NR	NR	NR	NR
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	NR	NR	NR	NR
Dentist, Pediatric	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	NR	NR	NR	NR
Hospital	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	26.8	30.5	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	100.0	100.0	100.0	100.0
Pharmacy	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
PCP, Adult	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	100.0*	NR	NR	NR	NR

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

NR represents instances in which HSAG identified no beneficiaries meeting the network requirements for the county and time/distance standard.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

† During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records affecting the Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS EPD program. BUFC – LTC researched the decrease and determined the error was in the submission of its CYE 2020 Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

NA indicates results are not applicable to the county.

Table D-9—ALTCS EPD Time/Distance Validation Results for Maricopa County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	BUFC – LTC †				Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	98.6	97.7	69.2	82.7	98.2	98.9	98.9	99.0	99.6	99.7	99.6	99.5
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0	100.0	75.8	100.0	96.6	97.8	97.4	97.9	100.0	97.8	97.9	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	99.5	99.5	67.8	77.7	99.4	99.5	99.5	99.5	99.3	99.2	99.2	99.1
Cardiologist, Adult	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Dentist, Pediatric	100.0	100.0	100.0	100.0	99.2	99.2	99.3	99.2	98.3	100.0	100.0	38.2
Hospital	99.9	99.7	98.0	97.9	100.0	100.0	100.0	100.0	100.0	99.9	99.9	99.8
Nursing Facility *(Only ALTCS EPD Contractors)*	99.7	99.5	0.1	0.3	99.8	99.9	99.9	99.9	99.7	99.6	99.6	99.5
Obstetrics/Gynecology (OB/GYN)	100.0	100.0	100.0	100.0	99.8	99.8	99.8	99.8	100.0	100.0	100.0	100.0
Pharmacy	99.7	99.6	99.7	99.6	99.6	99.6	99.7	99.7	99.6	99.7	99.7	99.5
PCP, Adult	99.8	99.8	99.8	99.8	99.9	99.8	99.9	99.8	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

† During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records affecting the Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS EPD program. BUFC – LTC researched the decrease and determined the error was in the submission of its CYE 2020 Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

Table D-10—ALTCS EPD Time/Distance Validation Results for Pinal County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	BUFC – LTC †				Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	100.0	99.7	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0*	100.0*	100.0*	100.0*	100.0	100.0	100.0	100.0	100.0*	100.0	100.0*	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	100.0*	100.0*	100.0*	100.0*	100.0	100.0	100.0	100.0	100.0*	100.0	100.0*	100.0
Dentist, Pediatric	100.0*	100.0*	100.0*	100.0*	100.0	100.0	100.0	100.0	100.0*	100.0	100.0*	80.0
Hospital	100.0	100.0	100.0	99.7	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	72.6	70.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Pharmacy	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
PCP, Adult	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0*	100.0*	100.0*	100.0*	100.0	100.0	100.0	100.0	100.0*	100.0	100.0*	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

† During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records affecting the Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS EPD program. BUFC – LTC researched the decrease and determined the error was in the submission of its CYE 2020 Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

NA indicates results are not applicable to the county.

North Region: Apache, Coconino, Mohave, Navajo, and Yavapai Counties

Table D-11—ALTCS EPD Time/Distance Validation Results for Apache County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	UHCCP – LTC			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	98.9	98.9	98.8	98.9
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0*	100.0*	100.0*	100.0*
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	98.9	98.9	100.0	98.9
Cardiologist, Pediatric	100.0*	100.0*	100.0*	100.0*
Dentist, Pediatric	100.0*	100.0*	100.0*	0.0*
Hospital	100.0	100.0	100.0	100.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	100.0*	100.0*	100.0*	100.0*
Pharmacy	97.7	97.7	98.8	98.9
PCP, Adult	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0*	100.0*	100.0*	100.0*

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results. Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

NA indicates results are not applicable to the county.

Table D-12—ALTCS EPD Time/Distance Validation Results for Coconino County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	UHCCP – LTC			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	100.0	100.0	100.0	100.0
Dentist, Pediatric	100.0	100.0	100.0	14.3
Hospital	100.0	100.0	100.0	100.0
Nursing Facility *(Only ALTCS EPD Contractors)*	91.5	89.8	89.7	90.8
Obstetrics/Gynecology (OB/GYN)	100.0	100.0	100.0	100.0
Pharmacy	97.8	99.6	99.6	99.6
PCP, Adult	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results. Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

NA indicates results are not applicable to the county.

Table D-13—ALTCS EPD Time/Distance Validation Results for Mohave County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	UHCCP – LTC			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0*	100.0*	100.0*	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	100.0	99.9	99.9	99.9
Cardiologist, Pediatric	100.0*	100.0*	100.0*	100.0
Dentist, Pediatric	100.0*	100.0*	100.0*	0.0
Hospital	99.4	99.4	99.5	99.5
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	100.0	100.0	100.0	100.0
Pharmacy	97.9	99.5	99.6	99.8
PCP, Adult	99.7	99.7	99.8	99.8
PCP, Pediatric	100.0*	100.0*	100.0*	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

NA indicates results are not applicable to the county.

Table D-14—ALTCS EPD Time/Distance Validation Results for Navajo County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	UHCCP – LTC			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0*	100.0*	100.0*	100.0*
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	99.6
Cardiologist, Pediatric	100.0	100.0	100.0*	100.0*
Dentist, Pediatric	100.0	100.0	100.0*	50.0*
Hospital	100.0	100.0	100.0	100.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	100.0	100.0	100.0	100.0
Pharmacy	100.0	100.0	100.0	99.6
PCP, Adult	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0	100.0	100.0*	100.0*

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

NA indicates results are not applicable to the county.

Table D-15—ALTCS EPD Time/Distance Validation Results for Yavapai County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	UHCCP – LTC			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	100.0	100.0	100.0	100.0
Dentist, Pediatric	100.0	100.0	100.0	6.3
Hospital	100.0	100.0	100.0	100.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	100.0	100.0	100.0	100.0
Pharmacy	99.6	99.6	99.5	99.7
PCP, Adult	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

NA indicates results are not applicable to the county.

South Region: Cochise, Graham, Greenlee, La Paz, Pima, Santa Cruz, and Yuma Counties

Table D-16—ALTCS EPD Time/Distance Validation Results for Cochise County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	BUFC – LTC†			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	99.8	99.7
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0*	100.0*	100.0*	100.0*
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	100.0	100.0	100.0	100.0
Dentist, Pediatric	100.0	100.0	100.0	100.0
Hospital	100.0	100.0	100.0	100.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	53.2	54.3
Obstetrics/Gynecology (OB/GYN)	100.0	100.0	100.0	100.0
Pharmacy	99.8	99.8	99.8	99.8
PCP, Adult	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

† During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records affecting the Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS EPD program. BUFC – LTC researched the decrease and determined the error was in the submission of its CYE 2020 Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

NA indicates results are not applicable to the county.

Table D-17—ALTCS EPD Time/Distance Validation Results for Graham County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	BUFC – LTC†			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	99.1	98.2
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0*	100.0*	100.0*	100.0*
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	100.0*	100.0*	100.0*	100.0*
Dentist, Pediatric	100.0*	100.0*	100.0*	100.0*
Hospital	100.0	100.0	100.0	100.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	86.5	87.0
Obstetrics/Gynecology (OB/GYN)	100.0*	100.0*	100.0*	100.0*
Pharmacy	100.0	100.0	100.0	100.0
PCP, Adult	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0*	100.0*	100.0*	100.0*

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

† During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records affecting the Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS EPD program. BUFC – LTC researched the decrease and determined the error was in the submission of its CYE 2020 Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

NA indicates results are not applicable to the county.

Table D-18—ALTCS EPD Time/Distance Validation Results for Greenlee County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	BUFC – LTC†			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NR	NR	NR	NR
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	NR	NR	NR	NR
Dentist, Pediatric	NR	NR	NR	NR
Hospital	100.0	100.0	100.0	60.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0*	100.0*	0.0*	0.0*
Obstetrics/Gynecology (OB/GYN)	100.0*	100.0*	100.0*	NR
Pharmacy	100.0	100.0	100.0	100.0
PCP, Adult	100.0	100.0	100.0	100.0
PCP, Pediatric	NR	NR	NR	NR

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

NR represents instances in which HSAG identified no beneficiaries meeting the network requirements for the county and time/distance standard.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

† During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records affecting the Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS EPD program. BUFC – LTC researched the decrease and determined the error was in the submission of its CYE 2020 Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

NA indicates results are not applicable to the county.

Table D-19—ALTCS EPD Time/Distance Validation Results for La Paz County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	BUFC – LTC†			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	28.6	22.7
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0*	NR	NR	NR
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	100.0*	100.0*	100.0*	100.0*
Dentist, Pediatric	100.0*	100.0*	100.0*	100.0*
Hospital	100.0	100.0	98.0	100.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	0.0	0.0
Obstetrics/Gynecology (OB/GYN)	100.0*	100.0*	100.0*	100.0*
Pharmacy	97.9	93.9	93.9	84.1
PCP, Adult	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0*	100.0*	100.0*	100.0*

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

NR represents instances in which HSAG identified no beneficiaries meeting the network requirements for the county and time/distance standard.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

† During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records affecting the Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS EPD program. BUFC – LTC researched the decrease and determined the error was in the submission of its CYE 2020 Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

NA indicates results are not applicable to the county.

Table D-20—ALTCS EPD Time/Distance Validation Results for Pima County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	BUFC – LTC†				Mercy Care – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	98.5	98.6	89.2	89.6	98.9	99.2	98.9	98.7
Behavioral Health Outpatient and Integrated Clinic, Pediatric	93.3	92.9	67.7	67.6	96.0	96.3	96.3	93.1
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	92.5	92.6	71.9	79.7	98.2	98.4	98.4	98.2
Cardiologist, Adult	99.8	99.9	99.9	99.8	99.9	99.9	99.9	99.9
Cardiologist, Pediatric	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Dentist, Pediatric	100.0	100.0	100.0	100.0	97.1	97.3	97.4	94.7
Hospital	99.8	99.9	98.3	98.3	99.9	99.9	99.9	99.9
Nursing Facility *(Only ALTCS EPD Contractors)*	99.5	99.7	96.9	96.1	99.8	99.8	99.8	99.8
Obstetrics/Gynecology (OB/GYN)	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Pharmacy	99.3	99.3	99.3	99.3	99.6	99.6	99.7	99.6
PCP, Adult	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0	100.0	100.0	100.0	100.0	100.0	100.0	97.4

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

† During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records affecting the Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS EPD program. UFC – LTC researched the decrease and determined the error was in the submission of its CYE 2020 Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

Table D-21—ALTCS EPD Time/Distance Validation Results for Santa Cruz County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	BUFC – LTC†			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	100.0	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0*	100.0*	100.0*	100.0*
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	100.0*	100.0*	100.0*	100.0*
Dentist, Pediatric	100.0*	100.0*	100.0*	100.0*
Hospital	100.0	100.0	100.0	100.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	99.2	99.2
Obstetrics/Gynecology (OB/GYN)	100.0	100.0	100.0	100.0
Pharmacy	100.0	100.0	100.0	100.0
PCP, Adult	100.0	100.0	100.0	100.0
PCP, Pediatric	100.0*	100.0*	100.0*	100.0*

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

† During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records affecting the Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS EPD program. BUFC – LTC researched the decrease and determined the error was in the submission of its CYE 2020 Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

NA indicates results are not applicable to the county.

Table D-22—ALTCS EPD Time/Distance Validation Results for Yuma County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	BUFC – LTC†			
	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	99.8	99.8	99.8	99.8
Behavioral Health Outpatient and Integrated Clinic, Pediatric	100.0	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA
Cardiologist, Adult	100.0	100.0	100.0	100.0
Cardiologist, Pediatric	100.0	100.0	100.0	100.0
Dentist, Pediatric	100.0	100.0	100.0	100.0
Hospital	100.0	100.0	2.5	3.0
Nursing Facility *(Only ALTCS EPD Contractors)*	100.0	100.0	0.0	0.0
Obstetrics/Gynecology (OB/GYN)	100.0	100.0	100.0	100.0
Pharmacy	99.8	99.8	99.8	99.8
PCP, Adult	99.8	99.8	99.8	99.8
PCP, Pediatric	100.0	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.

Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

† During CYE 2020 Quarters 2 and 3, BUFC – LTC's submission included extremely reduced numbers of provider records affecting the Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, Hospital, and Nursing Facility standards for its ALTCS EPD program. BUFC – LTC researched the decrease and determined the error was in the submission of its CYE 2020 Quarters 2 and 3 PAT files but was unable to correct the numbers until its CYE 2020 Quarter 4 submission. This error impacted BUFC – LTC's calculated compliance with these standards in several counties.

NA indicates results are not applicable to the county.

This section presents quarterly validation findings specific to the ALTCS DD line of business, with one results table for each of the following counties by region:

1. Central Region: Gila, Maricopa, Pinal
2. North Region: Apache, Coconino, Mohave, Navajo, Yavapai
3. South Region: Cochise, Graham,[D-7] Greenlee, La Paz, Pima, Santa Cruz, Yuma

Each county-specific table summarizes quarterly validation results containing the percent of beneficiaries meeting each time/distance standard by quarter and Contractor, with color-coding to identify whether the time/distance standard was *"met"* or *"not met."*

The value, "NA," is shown for time/distance standards that do not apply to the county or ALTCS DD line of business.

The value, "NR," is shown for time/distance standards in which no beneficiaries met the network requirement denominator for the ACC line of business and county; therefore, HSAG calculated no corresponding time/distance result.

Yellow color-coding identifies instances in which HSAG's time/distance results differed from the Contractor's ACOM 436 results, but still met the minimum network requirement. Yellow color-coding does not appear for time/distance results for CYE 2020 Quarter 2, as AHCCCS suspended Contractors' ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

Red color-coding identifies instances in which HSAG's time/distance results that did not meet the compliance standard, regardless of the Contractor's ACOM 436 results.

An asterisk (*) identifies instances in which fewer than five beneficiaries were included in the denominator of HSAG's time/distance results.

[D-7] Graham County includes the 85542, 85192, and 85550 ZIP Codes representing the San Carlos Tribal area; these ZIP Codes are physically located in Gila or Pinal County.

Central Region: Gila, Maricopa, and Pinal County

Table D-23—ALTCS DD Time/Distance Validation Results for Gila County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	100.0	100.0	58.1	NA	100.0	100.0	100.0
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Pharmacy	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
PCP, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
PCP, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
represents time/distance standard results that do not meet the compliance standard based on HSAG's results.
NA indicates results are not applicable to the county.

Table D-24—ALTCS DD Time/Distance Validation Results for Maricopa County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	97.2	96.8	98.0	NA	97.4	97.9	97.9
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	97.9	97.4	97.9	NA	97.7	98.0	98.1
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	99.3	99.3	99.2	NA	98.8	98.8	98.8
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	99.9
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	99.5	99.5	99.5	NA	99.7	99.7	99.7
Hospital	NA	100.0	100.0	100.0	NA	99.9	99.9	99.9
Obstetrics/Gynecology (OB/GYN)	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Pharmacy	NA	99.6	99.6	99.5	NA	99.4	99.4	99.4
PCP, Adult	NA	99.7	99.7	99.7	NA	99.7	99.7	99.8
PCP, Pediatric	NA	99.7	99.8	99.7	NA	99.9	99.9	99.9

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

Table D-25—ALTCS DD Time/Distance Validation Results for Pinal County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	100.0	100.0	99.5	NA	100.0	100.0	100.0
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Pharmacy	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
PCP, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
PCP, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
NA indicates results are not applicable to the county.

North Region: Apache, Coconino, Mohave, Navajo, and Yavapai Counties

Table D-26—ALTCS DD Time/Distance Validation Results for Apache County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	50.0	50.0	50.0	NA	70.7	70.3	68.4
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	0.0*	100.0*	100.0*	NA	66.7	67.4	70.5
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	50.0	50.0	50.0	NA	92.9	92.9	63.9
Cardiologist, Pediatric	NA	0.0*	100.0*	100.0*	NA	100.0	100.0	77.1
Dentist, Pediatric	NA	0.0*	0.0*	0.0*	NA	66.0	68.1	70.8
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
Pharmacy	NA	100.0	100.0	100.0	NA	63.2	65.0	65.0
PCP, Adult	NA	83.3	83.3	83.3	NA	88.6	92.9	91.7
PCP, Pediatric	NA	100.0*	100.0*	100.0*	NA	85.1	89.4	91.7

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

NA indicates results are not applicable to the county.

Table D-27—ALTCS DD Time/Distance Validation Results for Coconino County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	85.7	88.9	88.9	NA	98.8	98.8	99.1
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0	100.0	100.0	NA	95.7	95.7	94.9
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	83.3	85.7	85.7	NA	99.7	99.7	99.3
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	6.3	4.8	95.7	NA	93.0	98.2	98.2
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
Pharmacy	NA	100.0	100.0	100.0	NA	93.4	93.4	93.7
PCP, Adult	NA	83.3	85.7	85.7	NA	96.9	96.3	96.3
PCP, Pediatric	NA	100.0	100.0	100.0	NA	93.0	95.9	95.2

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
represents time/distance standard results that do not meet the compliance standard based on HSAG's results.
* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.
NA indicates results are not applicable to the county.

Table D-28—ALTCS DD Time/Distance Validation Results for Mohave County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0	100.0	100.0	NA	99.7	99.7	99.8
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	90.0	91.7	92.3	NA	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	99.7	99.7	99.7
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	40.0	41.7	92.3	NA	98.4	99.5	99.2
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Pharmacy	NA	94.4	95.0	95.2	NA	98.3	98.3	98.8
PCP, Adult	NA	100.0	100.0	100.0	NA	99.4	99.4	99.4
PCP, Pediatric	NA	100.0	100.0	100.0	NA	99.5	99.5	99.5

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
represents time/distance standard results that do not meet the compliance standard based on HSAG's results.
NA indicates results are not applicable to the county.

Table D-29—ALTCS DD Time/Distance Validation Results for Navajo County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0	100.0	100.0	NA	97.4	97.4	97.4
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0*	100.0*	100.0*	NA	93.8	94.7	94.7
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	97.2
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	99.2
Dentist, Pediatric	NA	40.0	40.0	100.0	NA	94.4	96.1	95.4
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
Pharmacy	NA	100.0	100.0	100.0	NA	94.4	96.4	96.1
PCP, Adult	NA	100.0	100.0	100.0	NA	99.4	100.0	100.0
PCP, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

represents time/distance standard results that do not meet the compliance standard based on HSAG's results.

* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.

NA indicates results are not applicable to the county.

Table D-30—ALTCS DD Time/Distance Validation Results for Yavapai County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	100.0	100.0	100.0	NA	98.8	99.1	98.6
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
Pharmacy	NA	100.0	100.0	100.0	NA	99.3	99.4	99.3
PCP, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
PCP, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.
NA indicates results are not applicable to the county.

South Region: Cochise, Graham, Greenlee, La Paz, Santa Cruz, Pima, and Yuma Counties

Table D-31—ALTCS DD Time/Distance Validation Results for Cochise County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	91.4	91.4	91.4	NA	95.8	96.4	95.8
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Pharmacy	NA	99.3	99.3	99.3	NA	99.5	99.7	99.7
PCP, Adult	NA	98.1	98.2	98.2	NA	100.0	100.0	100.0
PCP, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
NA indicates results are not applicable to the county.

Table D-32—ALTCS DD Time/Distance Validation Results for Graham County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	11.8	7.8	1.9	NA	94.9	95.1	95.0
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Pharmacy	NA	98.0	98.0	98.1	NA	95.3	95.5	95.6
PCP, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
PCP, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
represents time/distance standard results that do not meet the compliance standard based on HSAG's results.
NA indicates results are not applicable to the county.

Table D-33—ALTCS DD Time/Distance Validation Results for Greenlee County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0	100.0	100.0	NA	100.0*	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	100.0*	100.0*	100.0
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	0.0	0.0	0.0	NA	100.0	100.0	57.1
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0	100.0	100.0	NA	100.0*	100.0*	100.0*
Pharmacy	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
PCP, Adult	NA	100.0	100.0	100.0	NA	100.0*	100.0*	100.0
PCP, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
represents time/distance standard results that do not meet the compliance standard based on HSAG's results.
* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.
NA indicates results are not applicable to the county.

Table D-34—ALTCS DD Time/Distance Validation Results for La Paz County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
Cardiologist, Pediatric	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	50.0*	50.0*	50.0*	NA	93.8	94.1	100.0
Hospital	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
Pharmacy	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
PCP, Adult	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0
PCP, Pediatric	NA	100.0*	100.0*	100.0*	NA	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
represents time/distance standard results that do not meet the compliance standard based on HSAG's results.
* indicates fewer than five beneficiaries were included in the denominator of HSAG's results.
NA indicates results are not applicable to the county.

Table D-35—ALTCS DD Time/Distance Validation Results for Pima County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	96.8	95.6	95.8	NA	97.4	97.9	98.4
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	95.3	94.4	94.4	NA	96.1	96.6	96.6
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	96.5	96.4	96.5	NA	92.5	92.4	92.3
Cardiologist, Adult	NA	99.8	99.8	99.8	NA	99.9	99.9	99.9
Cardiologist, Pediatric	NA	99.7	99.7	99.7	NA	100.0	100.0	99.8
Dentist, Pediatric	NA	96.4	96.4	96.4	NA	99.0	99.4	98.9
Hospital	NA	99.6	99.6	99.6	NA	99.8	99.8	99.8
Obstetrics/Gynecology (OB/GYN)	NA	100.0	99.5	99.6	NA	100.0	100.0	100.0
Pharmacy	NA	98.0	98.1	98.1	NA	98.9	98.9	98.9
PCP, Adult	NA	99.7	99.7	99.7	NA	99.9	99.9	99.9
PCP, Pediatric	NA	99.6	99.7	99.7	NA	99.5	99.4	99.6

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.

Table D-36—ALTCS DD Time/Distance Validation Results for Santa Cruz County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Pharmacy	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
PCP, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
PCP, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
NA indicates results are not applicable to the county.

Table D-37—ALTCS DD Time/Distance Validation Results for Yuma County—Percent of Beneficiaries Meeting Minimum Network Requirements

Minimum Network Requirement	Mercy Care – LTC				UHCCP – LTC			
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Behavioral Health Outpatient and Integrated Clinic, Adult	NA	100.0	100.0	100.0	NA	99.7	99.7	99.7
Behavioral Health Outpatient and Integrated Clinic, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Behavioral Health Residential Facility *(Only Maricopa and Pima Counties)*	NA	NA	NA	NA	NA	NA	NA	NA
Cardiologist, Adult	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Cardiologist, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Dentist, Pediatric	NA	96.9	97.0	97.1	NA	100.0	100.0	100.0
Hospital	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Obstetrics/Gynecology (OB/GYN)	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0
Pharmacy	NA	100.0	100.0	100.0	NA	99.7	99.7	99.7
PCP, Adult	NA	100.0	100.0	100.0	NA	99.7	99.7	99.7
PCP, Pediatric	NA	100.0	100.0	100.0	NA	100.0	100.0	100.0

represents Contractor-reported results that differ from HSAG's results and meet the compliance standard based on HSAG's results.
Contractor reported results were unavailable in CYE 2020 Q2 as AHCCCS suspended ACOM 436 quarterly reporting due to the COVID-19 public health emergency.
NA indicates results are not applicable to the county.

Appendix E. Network Adequacy Report

The following pages contain the 2020 AHCCCS Network Adequacy Report.

AHCCCS
Arizona Health Care Cost Containment System

2020 AHCCCS NETWORK ADEQUACY REPORT

PREPARED BY
DIVISION OF HEALTH CARE MANAGEMENT, OPERATIONS

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Purpose

This report outlines the processes the Arizona Health Care Cost Containment System (AHCCCS) uses to ensure contracted Managed Care Organizations (health plans) and state agencies maintain adequate networks to serve Medicaid beneficiaries in Arizona.

The report is designed to address the requirements outlined as mandatory External Quality Review (EQR) activities under 42 CFR 438.358(b)(1)(iv), state monitoring of the availability and accessibility of services through network adequacy standards under 42 CFR 438.66(b)(11), and Arizona's review of the health plans' assurances of adequate capacity of services under 42 CFR 438.207(d).

In this report, AHCCCS describes its program, requirements for contracted health plans and authorized state agencies, the reporting used to ensure network adequacy, how the validity and accuracy of this reporting is ensured, and other work used to ensure Arizonan's have reasonable access to Medicaid services.

Based upon this program and the documentation, AHCCCS assures the Center for Medicare and Medicaid Services (CMS) that its contracted health plans meet the state's requirements for the availability of services as set forth in 42 CFR 438.68 and 438.206.

Program Description

Arizona currently operates under an 1115 Waiver, extended by CMS on September 30, 2016. The extension was approved for a five-year period from October 1, 2016 to September 30, 2021.

AHCCCS administers a wide variety of covered services through its Medicaid program. These services include acute care services, behavioral health services covering general mental health as well as crisis services, services for members determined to have a Serious Mental Illness (SMI), children in the state's foster care program, and long term care and support services for the state's aging and/or physically disabled population, including individuals with developmental disabilities.

For most members[1], services are administered through contracts with health plans, including contracts with two Arizona state agencies.

- ***AHCCCS Complete Care (ACC) Contractors*** provide integrated care addressing the physical and behavioral health needs for the majority of Title XIX/XXI eligible children and adults. AHCCCS contracts with seven ACC Contractors: Arizona Complete Health-Complete Care Plan, Banner University Family Care, Care1st Health Plan, Magellan Complete Care, Mercy Care, Health Choice of Arizona, and UnitedHealthcare Community Plan. Each ACC Contractor is assigned to serve one or more of three county-based Geographic Service Areas (GSAs).

- ***Regional Behavioral Health Authority (RBHA) Contractors*** provide integrated physical and behavioral health services to eligible members determined to have a Serious Mental Illness as well as comprehensive behavioral health services to individuals enrolled in CMDP, as outlined below. RBHA Contractors are also responsible for the provision of crisis services to all individuals, including but not limited to, crisis telephone services, mobile crisis teams and crisis stabilization services. AHCCCS contracts with three RBHA Contractors: Arizona Complete Health-Complete Care Plan, Mercy Care and Health Choice of Arizona. Each RBHA Contractor is assigned to serve one of three county-based GSAs.

- ***Arizona Long Term Care System Elderly and Physically Disabled (ALTCS/EPD) Contractors*** provide long term services and supports and acute physical and behavioral health services to eligible members who are Elderly and/or have a Physical Disability. AHCCCS Contracts with three ALTCS/EPD Contractors: Banner University Family Care, Mercy Care and UnitedHeathcare Community Plan. Each ALTCS/EPD Contractor is assigned to serve one or more three county-based GSAs.

- ***Arizona Long Term Care System Arizona Department of Economic Security/Division of Developmental Disabilities (ALTCS/DDD)*** is a contracted

[1] Arizona American Indian members meeting specific criteria may receive services through a health plan, or may choose to receive services through the state-administered fee for service program

Arizona state agency responsible for providing long term services and supports and acute physical and behavioral health services to eligible members with Intellectual and/or Developmental Disabilities as outlined under Arizona state law. The ALTCS/DDD Contractor directly contracts with providers for long term care services and supports statewide, and subcontracts with two health plans who administer acute physical and behavioral health services to ALTCS/DDD members statewide.

- ***Department of Child Safety/Comprehensive Medical and Dental Program (CMDP)*** is a contracted Arizona state agency responsible for providing physical health services for children in the custody of the Department of Child Safety (DCS) as outlined under Arizona state law. Current Arizona law allows CMDP members to see any AHCCCS registered provider.

AHCCCS provides oversight of health plans through contracts, policies, and guidance documents.

AHCCCS Contracts are available on the AHCCCS website at the following link: https://www.azahcccs.gov/Resources/OversightOfHealthPlans/SolicitationsAndContracts/contracts.html

The AHCCCS Contractor Operations Manual (ACOM) provides information to health plans on their operational responsibilities and requirements under the AHCCCS program. The AHCCCS Medical Policy Manual (AMPM) provides information to health plans and providers regarding the services covered within the AHCCCS program. Both Policy Manuals are available on the AHCCCS website at the following link: https://www.azahcccs.gov/Resources/GuidesManualsPolicies/.

In addition, AHCCCS has developed several guidance documents that exist outside of these policies. The primary guidance document related to network adequacy is the AHCCCS Provider Affiliation Transmission (PAT) Manual, found at the Guides, Manuals and Policies page linked above.

Health plans demonstrate compliance with program requirements through the submission of required deliverables. These deliverables are identified in a table within each contract under a section called "Contractor Chart of Deliverables". The chart defines each deliverable submission requirements, including due date and any associated policy and checklist.

If, as a result of AHCCCS' review of the deliverable, or if for any other reason a health plan fails to demonstrate compliance with contractual requirements, AHCCCS may elect to impose an Administrative Action. Administrative Actions may include the issuance of any or all of the following: Notice of Concern, Notice to Cure, a mandated Corrective Action Plan, or financial sanction. AHCCCS also publishes issued Administrative Actions on its website at: https://www.azahcccs.gov/Resources/OversightOfHealthPlans/AdministrativeActions/

Deliverables Demonstrating Network Adequacy

In order to demonstrate network adequacy, AHCCCS health plans submit a number of deliverables as outlined below:

Provider Network Development and Management Plan (Network Plan) – The Network Plan outlines the health plan's process to develop, maintain, and monitor an adequate provider network which is supported by written agreements and is sufficient to provide access to all services under their contract. The Network Plan is submitted annually. Its purpose is to ensure sufficient provision of services to members by outlining network activity and performance in the preceding year, as well as proposing a comprehensive plan for the provision of services in the coming year.

The elements of the Network Plan are dictated by a checklist of mandatory elements outlined as part of ACOM Policy 415 (*See Attachment B ACOM 415 Network Plan Checklist*). The checklist is derived from federal and state law and regulations, policy, and AHCCCS initiatives, and is updated on a regular basis. Checklist elements that health plans must include in the Network Plan include, but are not limited to the following:

- A formal attestation of the health plan's network adequacy,
- An evaluation of the previous contract year's network plan,
- A description of the current status of the network by service type,
- A description of the health plan's process for evaluating its network adequacy,
- An evaluation of the previous year's compliance with AHCCCS network standards
- A review of services provided by out of network providers, and
- A description of the health plan's approach to community-based providers.

AHCCCS performs a cross agency review by subject matter experts who review the Network Plans and provide feedback on areas within their areas of expertise. The feedback is collected and the Network Plan is either accepted or rejected, requiring resubmission until the Network Plan is accepted.

The Provider Affiliation Transmission (PAT) File – The PAT file is a quarterly electronic submission outlining each health plan's contracted provider network. The PAT file is used as a source of validating health plan compliance with minimum network requirements, to support review of material change submissions, and to assist in the research of network issues.

Minimum Network Requirements Verification – Each quarter, health plans[2] are required to submit a completed Minimum Network Requirement Verification Report (Verification Report). The requirements for this report are outlined in ACOM Policy 436. In the Verification Report health plans describe their compliance with minimum network requirements, including time and distance requirements (*See Attachment C ACOM 436 Verification Report*). These requirements identify thirteen provider types for which AHCCCS

[2] CMDP is exempted from this requirement as state law also allows members enrolled in CMDP to see any AHCCCS registered provider. This lack of a defined provider network prohibited this kind of network analysis for CMDP.

has developed minimum time and distance standards to ensure geographic access to services. The Verification Report includes standards specific to all health plans, as well as some standards specific to RBHA and ALTCS/EPD health plans. Moreover, some standards are measured against specific member populations and the standards vary by county. These standards are identified in Table 1, below:

Table 1 - AHCCCS Minimum Time and Distance Standards

Provider Type	Beneficiary Population	Network Standard Maricopa and Pima Counties	Network Standard All Other Arizona Counties
1. Behavioral Health Outpatient and Integrated Clinic, Adult	Beneficiaries aged 18 years and older	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 60 miles
2. Behavioral Health Outpatient and Integrated Clinic, Pediatric	Beneficiaries younger than 18 years	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 60 miles
3. Behavioral Health Residential Facility *(Applies to Maricopa and Pima Counties Only)*	All beneficiaries	90 percent of beneficiaries within 15 minutes or 10 miles	Not Applicable
4. Cardiologist, Adult	Beneficiaries aged 21 years and older	90 percent of beneficiaries within 30 minutes or 20 miles	90 percent of beneficiaries within 75 minutes or 60 miles
5. Cardiologist, Pediatric	Beneficiaries younger than 21 years	90 percent of beneficiaries within 60 minutes or 45 miles	90 percent of beneficiaries within 110 minutes or 100 miles
6. Crisis Stabilization Facility *(Applies to RBHAs only)*	All beneficiaries	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 45 miles
7. Dentist, Pediatric	Beneficiaries younger than 21 years	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 40 minutes or 30 miles
8. Hospital	All beneficiaries	90 percent of beneficiaries within 45 minutes or 30 miles	90 percent of beneficiaries within 95 minutes or 85 miles
9. Nursing Facility *(Applies to ALTCS/EPD Plans Only)*	All beneficiaries currently residing in their own home	90 percent of beneficiaries within 45 minutes or 30 miles	90 percent of beneficiaries within 95 minutes or 85 miles
10. Obstetrics/Gynecology (OB/GYN)	Female beneficiaries aged 15 to 45 years	90 percent of beneficiaries within 45 minutes or 30 miles	90 percent of beneficiaries within 90 minutes or 75 miles
11. Pharmacy	All beneficiaries	90 percent of beneficiaries within 12 minutes or 8 miles	90 percent of beneficiaries within 40 minutes or 30 miles
12. PCP, Adult	Beneficiaries aged 21 years and older	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 40 minutes or 30 miles
13. PCP, Pediatric	Beneficiaries younger than 21 years	90 percent of beneficiaries within 15 minutes or 10 miles	90 percent of beneficiaries within 40 minutes or 30 miles

AHCCCS validates the Verification Report submissions by conducting an independent time and distance analysis of the health plan's compliance. This analysis is completed through a contract with Health Services Advisory Group (HSAG). Each quarter, AHCCCS provides HSAG with each health plan's Verification Report submission, the health plan's PAT file, the health plan's enrolled membership and a file of all AHCCCS registered providers. For each

health plan, HSAG produces a report comparing the Verification Report submissions with its validation.

To ensure health plans have the resources to address discrepancies found in the validation process, AHCCCS provides the following information to the health plans:

- The health plan's quarterly report completed by HSAG
- The list of the providers sent to HSAG for the analysis
- The list of addresses rejected by HSAG's address matching software as not compliant with United State Postal Service standards

AHCCCS provided this information to the health plans with the expectation that they research the discrepancies and identify and correct any reporting issues for future submissions.

After completion of the individual quarterly reports, HSAG also generated an annual validation report which is attached with this Network Adequacy Report (*See Attachment A HSAG Validation Report)*. This report covers Contract Year Ending (CYE) 2019 Quarter 4 through CYE 2020 Quarter 3.

AHCCCS identified a number of areas where health plans appear to struggle to meet the minimum network requirements. For example, the validation of both ACC contractors serving Apache County shows difficulty in meeting the time and distance requirements for several provider types. Specifically, Pediatric Dentists, and Pharmacies. Compliance with these standards is complicated by the extremely rural nature of significant parts of these counties, as well as the presence of tribal providers that have been excluded from these time and distance calculations. Previously, both ACC contractors struggled with Outpatient and Integrated Clinics (Adult and Pediatric). However, in the past year Care1st Health Plan has addressed this gap.

Also, during CYE 2020 Quarters 2 and 3, Banner University Family Care's (Banner UFC) PAT file submission reported a significantly reduced number of provider records measured under Outpatient and Integrated Clinic (Adult and Pediatric), Behavioral Health Residential Facility, and Hospital standards for its ACC program. This was due to an error in the submission of its PAT files that was unable to be corrected until Quarter 4. This reporting error impacted Banner UFC's calculated compliance with these standards in several counties.

The process of reviewing and validating the health plans' progress towards compliance with minimum network requirements is underscoring the relative lack of providers in some of Arizona's more rural counties. ACOM Policy 436 does include an exception process for health plans to request an exception from any minimum network standard that cannot be met after all efforts are exhausted. AHCCCS will review certain criteria to determine if an exception will be allowed, these criteria include but are not limited to; the number of providers available in the area, provider willingness to contract with a health plan, the availability of IHS/638 facilities[3] to serve the American Indian population, and the availability of alternate service delivery mechanisms. Plans are then required to monitor member access

[3] American Indian members are able to receive services from any IHS/638 facility regardless of contracted status with a health plan.

to the services covered by the exception while the exception is in place. In CYE 2020 there were no exemptions in place.

In addition to time and distance standards, AHCCCS has established a number of other minimum network requirements that define network access under this policy.

- ALTCS/EPD and ALTCS/DDD health plans report compliance with requirements for long term care facilities in specific areas of any county served.
- All health plans report compliance with network requirements related to Multi-Specialty Interdisciplinary Clinics (MSICs).
- RBHA health plans report compliance with Mobile Behavioral Health Crisis Team response time requirements.

Appointment Availability Monitoring and Reporting – In order to evaluate the practical ability of members to find a timely appointment, AHCCCS has established minimum appointment availability requirements, outlined in ACOM Policy 417. Under this policy, AHCCCS establishes specific timeframes that members should expect to receive an appointment within a health plan's provider network. These timeframes are categorized by provider type and include varying degrees of need for appointments. Appointment availability standards monitor appointments with the following providers: primary care physicians (PCPs), specialists, dentists, maternity care providers, behavioral health providers, and providers prescribing psychotropic medications. A separate section in the Policy outlines appointment availability requirements specific to behavioral health appointments for members in legal custody of DCS.

Each quarter health plans submit the Appointment Availability report outlining their method for monitoring their provider network against appointment standards, as well as a matrix specifying audited provider compliance with standards (*See Attachment D ACOM 417 Template*). Provider compliance for PCPs, specialists and dentists is reported separately for new and established members, where a new member would be one who has not received services from the physician within the previous three years.

While AHCCCS has not established specific compliance percentages for meeting appointment availability standards, health plan performance is closely monitored and trended over time. AHCCCS addresses any significant changes in provider availability directly with the health plan when needed. Further, in their Network Plan, health plans must compare their performance in these standards to the previous year, and if there was a decrease in available appointments conduct an analysis of the sufficiency of their network.

Material Changes to the Provider Network – AHCCCS has established reporting requirements for when a significant change is made to a health plan's provider network in order to evaluate the impact of the change. As outlined in ACOM Policy 439, AHCCCS requires health plans to evaluate changes made to their provider network for materiality. A material change to provider network is defined as any change in the composition of or payments to the health plan's provider network that would cause or is likely to cause more than five percent of its members in a GSA to change where they receive services, or any

change impacting fewer than five percent of members but involves a provider or provider group who is the sole source of a service, or operates in an area with limited alternate sources.

When the health plan identifies a material change to provider network, it submits an assessment of the impact of the change, how the health plan will transition members, a communication plan regarding the change, and how the health plan will monitor the impact of the change after transition (*See Attachment E ACOM 439 Material Change Checklist*). After approval of a material change in provider network, AHCCCS commonly requires periodic reports on the status of transitioning members. In CYE 2020, AHCCCS approved and monitored six material changes from contracted health plans.

Provider Changes Due to Rates Reporting – Health plans must also identify when a provider leaves, or reduces services due to rates, regardless of whether the change is a material impact on the provider network. Specifically, ACOM Policy 415 includes and attachment where plans report the name, type, whether the provider is a PCP, the region served, and number of members assigned of any provider leaving the network, or reducing or diminishing their scope of services due to sufficiency of rates (*See Attachment F ACOM 415 Rates Template*). The health plan must also conduct an analysis to determine if the loss is a material change and requires more in-depth reporting under ACOM Policy 439.

AHCCCS uses this information to inform its rate setting, access to care reporting to CMS, and also evaluate the impact on provider networks of Arizona Statutory changes, such as the passage of a new minimum wage law impacting the salaries of health care workers.

Gap in Critical Services Reporting – AHCCCS has established reporting requirements for gaps in the provision of specific Home and Community Based (HCBS) services provided to ALTCS/EPD and ALTCS/DDD members. Under ACOM Policy 413, each quarter these health plans must report their 'gap hours', or the number of hours of scheduled Attendant Care, Personal Care, Homemaker and Respite care services that were not delivered to members without being replaced by another paid caregiver (*See Attachment G ACOM 413 Gap Reporting Template*). Plans also report the percent of gap hours compared to total authorized hours for these services. In CYE 2020, AHCCCS health plans typically reported .05% or less of their authorized hours were gap hours.

This reporting was instituted as a part of a settlement agreement for a class action lawsuit. While the lawsuit has since been dismissed, AHCCCS retains this report and continues to monitor it as a measure of member access to HCBS services deemed critical under the lawsuit. Starting in 2021, AHCCCS will be replacing this reporting with an automated method through its planned Electronic Visit Verification program.