



AHCCCS MCO Update Meeting

January 29, 2025

Director Update

Carmen Heredia AHCCCS Director





2025 Strategic Plan





2025-2029 Strategic Plan



Federal Update

Max Seifer
DPPSP Federal Relations Chief





Reentry Services Overview

 On December 27, 2024, CMS granted approval to provide limited coverage for services furnished to a subset of incarcerated individuals for up to 90 days immediately prior to their expected dates of release.



- Demonstration Initiative Goals
 - Increase coverage, continuity of coverage, and appropriate service uptake
 - Improve access to services
 - Improve coordination and communication
 - Increase additional investments in health care and related services
 - o Improve connections between carceral settings and community services
 - Reduce all-cause deaths and reduce number of ED visits and inpatient hospitalizations
 - Provide intervention for certain behavioral health conditions



- Eligibility
 - o To qualify for services covered under this demonstration approval, individuals residing in a correctional facility must have been determined eligible for Medicaid or the Children's Health Insurance Program (CHIP) (or be eligible for CHIP except for their incarceration status) pursuant to an application filed before or during incarceration, and have an expected release date within 90 days.

- Participating Facilities
 - Jails
 - o Prisons
 - Youth Correctional Facilities
 - Tribal Correctional Facilities



- Covered Services
 - Case Management
 - Medication Assisted Treatment (MAT) Services
 - o 30-day Supply of Prescription Medications
 - O Practitioner Office Visit
 - o Peer Support Services



- Next Steps
 - AHCCCS will establish a timeline for implementation with a proposed effective go-live date of October 1, 2026.
 - AHCCCS will begin the demonstration with prison facilities administered by the Arizona Department of Corrections Rehabilitation and Reentry (ADCRR), these facilities will make up the first phase of the program.



Consolidated Appropriations Act (CAA 2023)

As part of the Consolidated Appropriations Act, 2023, section 5121 adds requirements for a certain set of services for Medicaid and CHIP juvenile beneficiaries who are incarcerated. This includes:

 A Medicaid eligible individual who is under 21 years of age, and individuals between the ages of 18 and 26 who is eligible for Medicaid under the former foster care children group.



Consolidated Appropriations Act (CAA 2023) cont.

- Under section 5121, state Medicaid and CHIP programs are required to offer the following:
 - Screening and diagnostic services: In the 30-days prior to release, or within one week or as soon as practicable after release, juveniles must receive screening and diagnostic services (including behavioral health screenings) in accordance with EPSDT requirements.
 - Targeted Case Management: In the 30-days prior to release and for at least 30-days following release



Consolidated Appropriations Act (CAA 2023) cont.

- States are required to have in place an internal operational plan detailing how the State will reach compliance by 1/1/25.
- This internal operational plan will be partnered with a SPA holding a 1/1/25 effective date. The SPA will:
 - Attest to meeting the above requirements
 - Authorize coverage of Targeted Case Management for this population



Consolidated Appropriations Act (CAA 2023) cont.

- AHCCCS is planning for a phased implementation dependent on the setting/facilities readiness.
- Phase 1 will begin 10/1/2025 with Arizona Dept. of Juvenile
 Corrections (ADJC). Additional facilities will be phased-in over the next two years with full implementation targeted to be complete 10/1/2027.
- Full capitation model will be implemented 10/1/2027.



H20 Updates

Completed Provider Registrations:

- H2O Shelter Providers- 2
- H2O Pretenancy/Tenancy providers-8

Applications Pending:

- Total # of pending H2O provider applications: 25
 - As noted by Solari, the AHCCCS Provider registration team has not seen these in APEP as of today.



H2O Members Identified/Served

- Total # Members who have received H2O services 244
 - Services include shelter, pre-tenancy and tenancy services.
- Total # of Members confirmed eligible or eligibility/connection to H2O services in progress - 442
- Total # Housed: 2 (move in Dec 17th and Jan 6!!!)
- Solari's H2O dashboard is online and elements are continuing to be added.



Exception to the "Four Walls" Requirement

- On November 1, 2024, CMS finalized the "Medicare Outpatient Prospective Payment Final Rule" (CMS 1809-FC)
- Historically, Medicaid Clinic Services were required to be provided within the physical "four walls" of the clinic.
- This rule includes new mandatory and optional exceptions to allow for Medicaid coverage of clinic services outside of the "four walls"
 - Mandatory exception for IHS and Tribal Clinics,
 - Optional exceptions for behavioral health clinics, and
 - Optional exceptions for services provided by personnel of clinics that are located in rural areas.
- This rule will permanently extend the existing grace period that was issued during the PHE.

Access to Care Rules

- AHCCCS has contracted with Myers & Stauffer for PM and implementation support.
- This has included focus groups and the creation of an implementation timeline.
- Key Changes for 2025 and 2026 Implementation include:
 - Establishment of MAC/BAC
 - Incentive Payment Updates in MCO contracts
 - Payment Analysis Claims Data
 - Publishment of FFS Rates and Comparative Analysis



HIPAA Privacy Rule - Reproductive Health

- Finalized by HHS April 2024 following the Dobbs Supreme Court
 Decision. Intended to protect access to and privacy of reproductive
 health care.
- The rule prohibits a regulated entity from using or disclosing an individual's PHI for for the purpose of initiating an investigation or proceeding against the individual, a health care provider, or other person in connection with reproductive health care.
- Requires entities to obtain an attestation for the disclosure of PHI to non-covered entities for any of the following purposes: 1) Health oversight activities, (2) Judicial/administrative proceedings, (3) Law enforcement purposes, or (4) Disclosures to coroners and medical examiners



Proposed HIPAA Security Rule

- This proposed rule was issued by HHS on December 27, 2024, and makes many changes to strengthen cybersecurity protections for PHI.
 - Requires the development and revision of a technology asset inventory and a network map that illustrates the movement of ePHI throughout the regulated entity's electronic information system,
 - Requires greater specificity for conducting a risk analysis,
 - Strengthen requirements for planning for contingencies and responding to security incidents,
 - Requires annual compliance audits and annual verification of technical safeguards,
 - Requires encryption of ePHI at rest and in transit, and more.
- HHS accepting comments on this rule until March 7, 2025.



Change in Federal Administration

- Trump Administration set to return to office on January 20, 2025
 - Ronald F. Kennedy Jr. selected* to lead Health and Human Services
 - Dr. Mehmet Oz selected* to lead Centers for Medicare & Medicaid Services
 - Drew Snyder* to lead Center for Medicaid and CHIP Services
- It's largely uncertain what changes may come to Medicaid. Key topics we are closely monitoring include:
 - Potential new Waiver priorities such as Medicaid work requirements
 - Potential changes to 2024 CMS final rules (Access Rule, Staffing Rule)
 - Potential changes to Medicaid Financing

Legislative Update

Kyle Sawyer
Assistant Director, Public Policy and Strategic
Planning



2025 Legislative Session Timeline

Mon. January 13th - 2024 Legislative Session begins

Thurs. January 16th - House Member 7 Bill Limit

Fri. January 17th- Executive Budget Proposal released.

- AHCCCS-specific agency details: <u>FY2026 Executive Budget</u>
- FY2026 Executive Budget Presentation
- FY 2026 Executive Budget Summary.pdf

Mon. February 3rd- Last day for Senate members to introduce bills

Mon. February 10th- Last day for House members to introduce bills

Fri. February 21st- Last day for House consideration of House Bills/Senate consideration of Senate bills

Mon. February 24th- Crossover week

Fri. March 28th - Last day for House consideration of Senate Bills/Senate consideration of House bills

April - June- Budget discussions and proposals



Legislative Forecast

AHCCCS Agency Bills/Initiatives: 2025

- Director Confirmation
- Traditional Healing Bill (being led by Arizona Advisory Council on Indian Health Care)



Unauthorized Plan Switch

Alisa Randall, AHCCCS Assistant Deputy Director, Clinical and MCO Operations





ACA Marketplace Unauthorized Plan Switch (UPS)

- There is increasing awareness of the practice by some agents and brokers of switching consumer's health coverage to a Marketplace Plan without the consumer's awareness.
- This is a nationwide issue which is much larger than Medicaid.
- CMS/HHS have taken forceful actions against agents and brokers who have engaged in UPS.
 - July 2024-CMS changed Marketplace to limit agent/broker access to unaffiliated consumers.
 - January 2025–CMS issued new rules to enhance enforcement authority.



Unauthorized Plan Switch

- Enrollment in a Marketplace Plan doesn't disqualify an AHCCCS Member. It will require AHCCCS to coordinate benefits with the Marketplace plan as AHCCCS is the payor of last resort.
- There is unlikely any benefit for an AHCCCS Member to also have Marketplace coverage. A Medicaid member cannot receive the Advanced Premium Tax Credit.
- Unauthorized enrollment of Medicaid members into a Marketplace plan can cause confusion, issues in accessing care, delays in receiving medical services.



Unauthorized Plan Switch

- Member Education-Members should beware of:
 - Offers of cash, gifts, or other perks to enroll in Marketplace or "Obamacare"
 - Unsolicited requests for personal info
 - Threats of legal action if you do not sign up for a plan
 - Sham websites with any of the above
- Consumers who believe they may have been the victim of unauthorized FFM agent or broker activity should call the Marketplace Call Center at 1.800.318.2596 (TTY: 1.855.889.4325) to resolve any coverage issues promptly.



Resources

- CMS Guide for Members (English/Spanish): https://www.cms.gov/files/document/agent-broker-infographic-2024final.pdf
- CMS Website: https://www.cms.gov/newsroom/press-releases/cmsupdate-actions-prevent-unauthorized-agent-and-broker-marketplaceactivity
- HHS Website: https://oig.hhs.gov/fraud/consumer-alerts/consumerfraud-health-insurance-marketplace/
- Health Insurance Marketplace: www.Healthcare.gov



(!) Alert: Unauthorized Agent and Broker **Activity on ACA Marketplace**

The Health Insurance Marketplace is seeing an increase in suspicious activity by some agents and brokers selling Marketplace coverage. This may include signing you up for coverage without your knowledge or switching you out of a plan you already have and into a new one.



Agents and Brokers are individuals and organizations that help enroll consumers In coverage and also get payments from insurance plans.



What you need to know to protect vourself

- Agents and brokers must get your permission when signing you up or making changes to your insurance plan.
- Health Insurance ads on social media or elsewhere that offer you cash, gifts, or other perks, could be a scam. Don't give out personal information that might be used without your consent.
- Use trusted, official sources to find legitimate help comparing and enrolling in Marketplace insurance. Go to "find local help" on HealthCare.gov or call the Marketplace Call Center at 1-800-318-2596 to find help in your area.



What to do if you suspect changes were made on vour account

- You may discover a potential problem with your coverage when you get mail or a call, or visit the doctor and try to use your insurance.
- If you believe you were enrolled in or switched to a plan without your knowledge, call the Marketplace Call Center at 1-800-318-2596 (TTY: 1-855-889-4325) so our official Marketplace representatives can resolve any coverage issues. Wait times are low and a representative will be able to help answer your questions.

How the Marketplace can help



If the Marketplace representatives determine you have been enrolled or had your plan switched without your knowledge, our representatives can work with your insurer and the Internal Revenue Service (IRS) to:

- Make sure the unauthorized plan is cancelled
- Make sure you're reenrolled in a plan that you choose
- Have inaccurate costs repaid to you
- Get corrected tax forms.





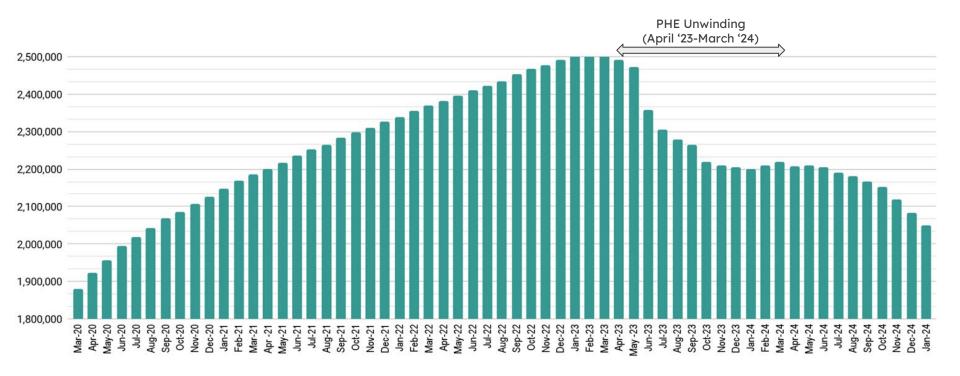
Enrollment Updates

Patty Dennis, DMPS Assistant Director





AHCCCS Population: March 2020 - January 2025





Likely Rationale for Enrollment Trends

AHCCCS' overall enrollment is decreasing, while certain populations (e.g., Prop 204 Childless Adults) remain significantly above pre-pandemic levels. This is likely due to multiple factors:

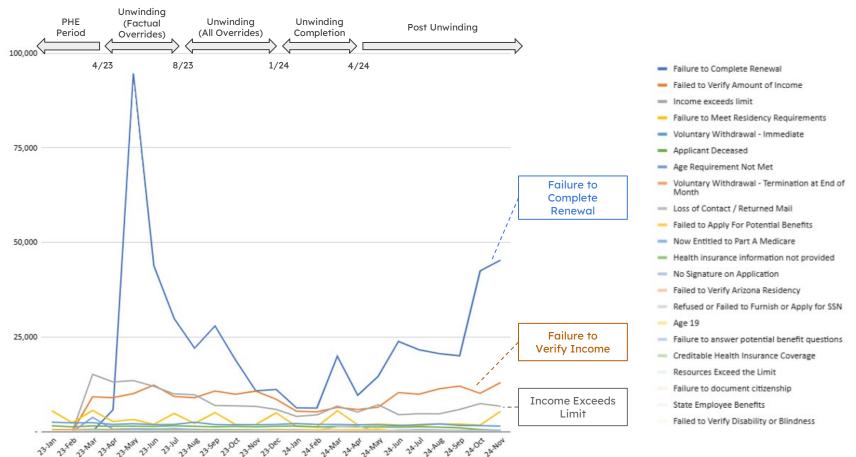
- Increased Awareness of Medicaid The Public Health Emergency and enhanced outreach by AHCCCS and stakeholders led to an all-time high in enrollment and improved methods to engage members.
- Tight Labor Market/Low Unemployment Unemployment is lower today than it was prior to the pandemic, leading to more Arizonans being over income for Medicaid. A tight labor market also affords more employment options for members to stay within Medicaid income limits, should they choose to do so.

Supportive Evidence of Rationale:

- Top 3 reasons for discontinuances are based on income
- AHCCCS referrals to the Marketplace trending up.
 - See <u>AHCCCS Eligibility Dashboard</u>
- Marketplace enrollment (Nationally and in AZ) is at an all-time high
- KidsCare Expansion group (200-225% FPL) is increasing and is nearly twice as large as originally anticipated



Reasons for AHCCCS Member Discontinuances





Contract and Policy Update

Sandi Borys
DMCO Contract and Policy Administrator





CONTRACT TIMELINE

Centers for Medicare and Medicaid Services (CMS) has added new requirements starting 7/1/2025 they now want to receive fully executed base contract(s) or contract amendment(s), which means we need all contracts signed and dated by all parties to allow submission by August 15.

			CONTRACT TIMELINE						20	
CONTRACTS OPEN	LOCK DOWN	Draft to MCOs	Comments Due FM MCOs	AHCCCS Responses Due	FINAL LOCK DOWN	Section B	Final Sent to MCOs	Signature pages due	Executed Contracts to	Contract Renewal
1/24/2025	5/16/2025	6/6/2025	6/27/2025	7/11/2025	7/18/2025	7/25/2025	7/29/2025	8/13/2025	8/15/2025	10/1/2025
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POLICY UPDATES

The landing pages for both our AHCCCS Contractor Operations Manual (ACOM) and the AHCCCS Medical Policy Manual (AMPM) have been updated.

Some of the Chapter titles found in the AMPM have been streamlined to be more inclusive of the various policies included in the Chapter.



PUBLIC COMMENT OPPORTUNITIES

Exciting changes for Stakeholders surrounding Public Comment Opportunities

▲ Public Comment Opportunity

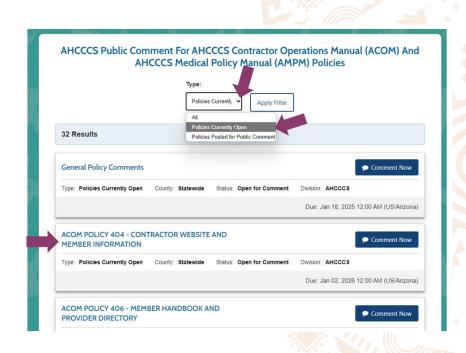
Stakeholders, tribal members, and the general public are invited to provide feedback on policies **Currently Open** and under review. Additionally, AHCCCS welcomes general comments on all policies with in the AHCCCS Contractor Operations Manual (ACOM) and the AHCCCS Medical Policy Manual (AMPM).

Your input is valued and appreciated, as it helps shape and improve these policies.



PUBLIC COMMENT FOR OPEN POLICIES

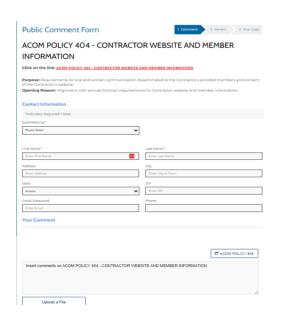
- Stakeholders will now be able to see and provide feedback on all policies that are currently open for revisions.
- Drop-down arrow within Type button
- Choose your option
- Apply Filter
- Complete list of policies you selected





PUBLIC COMMENT OPPORTUNITIES

- The current link in red
- A brief overview of what can be found in the Policy
- The original reason that the policy has been opened.





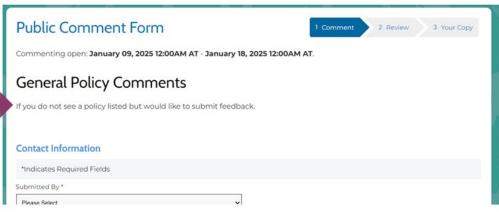
- Stakeholders will be able to review the version of the policy currently posted on the AHCCCS website
- Review the purpose of the policy.
- Review the original reason the policy is currently open.



PUBLIC COMMENT OPPORTUNITIES

Stakeholders will also have the opportunity to provide feedback on any policy found in the ACOM and AMPM by utilizing the General Policy Comments.







PUBLIC COMMENT FOR POLICIES POSTED FOR PUBLIC COMMENT

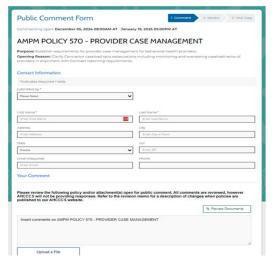
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- Apply Filter
- Complete list of policies you selected





PUBLIC COMMENT FOR POLICIES POSTED FOR PUBLIC COMMENT

- Stakeholders will continue to be able to see and provide feedback on all policies currently open for Public Comment
- Timeframe that the Policy is open for comments
- The Purpose of the Policy
- The Reason the policy was open

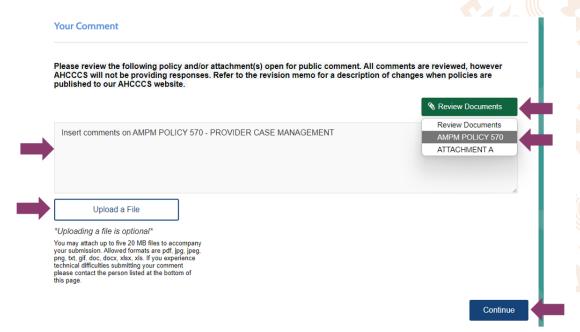






PUBLIC COMMENT FOR POLICIES POSTED FOR PUBLIC COMMENT

Toward the bottom of the Public Comment Form you will be able to Review all documents related to that policy.





PUBLIC COMMENT FOR POLICIES POSTED FOR PUBLIC COMMENT

HEALTH CARE COST CONTAINMENT SYSTEM

CHAPTER 500 - CARE COORDINATION REQUIREMENTS

570 - PROVIDER CASE MANAGEMENT

EFFECTIVE DATES: 10/01/21, 10/01/22, 02/12/24, UPON PUBLISHING

APPROVAL DATES: 07/13/21, 04/21/22, 08/17/23, 11/27/242

I. PURPOSE

This Policy applies to ACC, ACC-RBHA, DCS CHP (CHP), and DES DDD (DDD) Contractors; and Fee-For-Service (FFS) Programs including: the American Indian Health Program (AIHP), DES DDD Tribal Health Program (DDD THP)3 TRBHA; and all FFS providers, excluding Federal Emergency Services Program (FESP). (For FES, refer to AMPM Chapter 1100). This Policy establishes requirements for provider case management for behavioral health providers.

For FFS members, case management may be provided by a TRBHA case manager or through a behavioral health provider, as applicable. If case management is being provided by a behavioral health facility, case managers shall work with the TRBHAs on care coordination. Refer to the TRBHA Intergovernmental Agreement (IGA) for care management/care coordination requirements.

For members who are enrolled with an ALTCS E/PD Contractormembers, all case management is provided by the Contractor, and A all activities and services outlined in this Policy are the responsibility of the ALTCS E/PD Contractor.5

For Tribal ALTCS members, case management is provided by the tribal case manager as specified in

Provider case management is not a reimbursable service for ALTCS E/PD or Tribal ALTCS.

Any violation of this Policy may result in administrative action, including but not limited to, sanctions as specified in ACOM Policy 408.

- Revisions are done in track changes either providing what is being add or stricken. At the end of the revised language will indicate a footnote.
- The footnote is the reason for the revision.



Date Policy is effective

Updated for programmatic changes reflecting AHCCCS/DFSM manages responsibilities for Prior Authorization

CONSTANT CONTACT NOTIFICATION

The Constant Contact Notifications are also changing. Stakeholders that have signed up for Policy Notifications will now see a more information surrounding policies that are either posted for Public Comment or Published to the website. For policies posted for Public Comment...

Greetings!

The following AHCCCS Policies and related materials have been revised and are open for Public Comment. The general public may review and submit comments regarding changes that are being presented.

The comment deadline is listed for each policy. The instructions for reviewing and providing comments can be found following this <u>link</u>. Please visit our AHCCCS Contractor Operations Manual and AHCCCS Medical Policy Manual web pages for more information.



(Policies Open for Public Comment)



Public comment deadline February 23, 2025



 ACOM POLICY 325 - TARGETED INVESTMENTS 2.0 PROGRAM - Policy was opened to align with 42 CFR 438.6(c) to clarify payments of Targeted Investments and Contractor requirements.

Resource links

AHCCCS Contractor Operations Manual

AHCCCS Medical Policy Manual

Sign up to receive our ACOM/AMPM Policy notifications



CONSTANT CONTACT NOTIFICATIONS

For Policies that are being Published to the website.

Updates to the <u>AHCCCS Medical Policy Manual (AMPM)</u> are now available on the <u>AHCCCS website</u>.



AMPM POLICY 320-V - BEHAVIORAL HEALTH RESIDENTIAL FACILITIES



AMPM Policy 320-V was revised to clarify prior authorization requirements for medically necessary behavioral health services that are not provided by the Behavioral Health Residential Facility (BHRF), including strengthening expectations for documentation, admission assessment, and treatment planning.

Please reference the January 14, 2025, Revision Memo for a complete list of changes at the following link:





Operational Review Update

Christina Quast
DMCO Assistant Director





Operational Review Process

- HSAG to conduct Operational Reviews (ORs) on behalf of AHCCCS starting 2025.
- The ORs will focus on compliance with the federal Medicaid managed care and CHIP regulations and related State contract requirements.
- Areas of review include the following:

Disenrollment: Requirements and Limitations	Coordination and Continuity of Care	Sub Contractual Relationships and Delegation		
Member Rights and Member Information	Coverage and Authorization of Services	Practice Guidelines		
Emergency and Poststabilization Services	Provider Selection	Health Information Systems		
Availability of Services	Confidentiality	Quality Assessment and Performance Improvement Program		
Assurances of Adequate Capacity of Services	Grievance and Appeal Systems	Program Integrity		

Operational Review Process (cont.)

- HSAG's new process and OR Tool(s) will not include all components of AHCCCS' prior OR Tools
- HSAG's staff would not have the ability to appropriately assess all components previously included in AHCCCS' OR Tools (e.g. Grants, OIFA)
- AHCCCS staff is currently reviewing past OR Tools to determine a process for items that will not be included in HSAG's OR Tool(s)
 - This review includes an evaluation of other information received by AHCCCS through deliverables outlined in Contracts
- AHCCCS will continue to provide updates to MCOs





Thank you

