

**Targeted Investments Year 2 Document Validation**

<b>Core Component</b>	<b>Review Criteria</b>
<b>1 - Participate in the Targeted Investment Program Quality Improvement Collaborative (QIC)</b>	<p><b>A. Attest</b>, through the TI 2.0 Application Portal once available in Fall 2024, that the organization has attended 100% of the QICs in the program year. AHCCCS will track and review Year 2 QIC group meeting attendance records for demonstration of 100% attendance. <b>Participants do not need to upload or provide documentation to validate QIC attendance unless there is a discrepancy.</b></p>
	<p><b>B. Submit name(s)</b>, through the TI 2.0 Application Portal once available in Fall 2024, of the individual(s) who have registered for the online learning platform and completed registration documentation (e.g., confirmation email message). <b>Participants do not need to upload or provide documentation to validate unless there is a discrepancy.</b></p>
	<p><b>C. Attest</b>, through the TI 2.0 Application Portal once available in Fall 2024, that the organization has submitted complete, timely projects to the ASU TIPQIC team in the program year. ASU TIPQIC will confirm that the organization has submitted all TI online projects by established due dates and the deliverables meet minimum expectations. <b>Participants do not need to upload or provide documentation to validate unless there is a discrepancy.</b></p>

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<b>Core Component</b>	<b>Review Criteria</b>
<p><b>2 - Plan and implement the <a href="#">National Culturally and Linguistically Appropriate Services (CLAS) Standards</a></b></p>	<p><b>A. Upload</b> a completed <a href="#">National CLAS Standards implementation checklist</a>, including a plan for implementing CLAS standards that are not yet in place. (i.e., standards for which the practice selected Planning to Implement or Not Planning to Implement at this Time). The plan must include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Organization review of standards 2-13 (2.2 through 2.13),</li> <li><input type="checkbox"/> The timeframe in which the practice aims to implement each standard,</li> <li><input type="checkbox"/> The individual(s) who leading implementation of each standard,</li> <li><input type="checkbox"/> A list of actions the practice is taking to implement each standard, and</li> <li><input type="checkbox"/> A description of additional resources the practice may need to implement each standard and how the practice plans to obtain such resources.</li> </ul> <p><b>B. Upload</b> documentation that demonstrates how the practice recruits and supports a diverse practice team. The documents must include a description of:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> How the practice team reflects the diversity of the population the practice serves,</li> <li><input type="checkbox"/> How the practice's current recruiting and hiring processes support diversity,</li> <li><input type="checkbox"/> How the practice promotes diversity among various staff roles (e.g., clinical staff, practice management, clerical),</li> <li><input type="checkbox"/> At least one opportunity to improve diversity throughout the practice (e.g., conducting regular assessments of hiring, retention and workforce demographics) and the practice's plan to act on that opportunity (e.g., promoting mentoring opportunities; building diversity-related performance metrics into management and leadership job descriptions and goals)</li> <li><input type="checkbox"/> How the practice includes information on providing culturally and linguistically appropriate care in staff training materials, and</li> <li><input type="checkbox"/> How the practice offers and incentivizes completion of training (in person or virtual) to all employees on providing culturally and linguistically appropriate care.</li> </ul> <p>Examples for how to improve recruitment of diverse staff include: development of community-based internships; collaboration with local schools, training programs and faith-based organizations; advertisement of job postings through minority job fairs, job boards and newsletters; development of job postings that are in multiple languages, use gender neutral language, and that consider lived experience; and updating the hiring process to blind-review resumes.</p>

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**C. Attest**, through the TI 2.0 Application Portal once available in Fall 2024, that the processes described in 2B (Standards 2-4) have been implemented by 9/30/2024. **Participants do not need to upload or provide documentation to validate unless there is a discrepancy.**

**D. NCQA ONLY - Upload** documentation that the practice expects will satisfy the requirements for:

- NCQA HE 1.A (Building a Diverse Staff), detailing:
  - activities completed
  - activities to be completed
  - key milestones
  - key dates for completion
- HE 1.B. (Promoting DEI amongst staff), detailing:
  - activities completed
  - activities to be completed
  - key milestones
  - key dates for completion

AHCCCS will confirm it meets other milestone elements (at minimum) and provide suggestions for what additional documentation NCQA may be looking for.

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Core Component	Review Criteria
<p><b>3 - Implement a process for screening addressing health-related social needs (HRSN)</b></p>	<p><b>A. Upload</b> documentation that outlines how the practice educates the member, obtains consent, performs HRSN screening and discusses screening results. The documents must include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The name of the screening tool and included domains (containing, at minimum: housing instability, utility assistance, food insecurity, transportation needs, interpersonal safety, employment, and justice involvement, ). If the HRSN screening is combined with other intake or screening tools, provide a copy.</li> <li><input type="checkbox"/> The languages in which the screening tool is available;</li> <li><input type="checkbox"/> A description of the population from whom data are being collected;</li> <li><input type="checkbox"/> When data are being collected (e.g., prior to the visit, during the visit);</li> <li><input type="checkbox"/> Where data are being collected (e.g., in the waiting room, in the visit room);</li> <li><input type="checkbox"/> How data are being collected (e.g., paper form, electronic survey);</li> <li><input type="checkbox"/> Who collects data/conducts the screen (e.g., community health worker, medical assistant);</li> <li><input type="checkbox"/> A script (if the screen is administered live) and/or written description (if the screen is administered through a survey) that explains for the member/family/caregiver: <ul style="list-style-type: none"> <li><input type="checkbox"/> why the practice is conducting the screening,</li> <li><input type="checkbox"/> how the information will be used,</li> <li><input type="checkbox"/> how the information will be shared,</li> <li><input type="checkbox"/> what happens if a need is identified, and</li> <li><input type="checkbox"/> how the practice will obtain and document member consent for performing the screening. This must include educating members of the option to opt out of screening;</li> </ul> </li> <li><input type="checkbox"/> The practice's process for reducing over screening of members that have recently been screened by a partner organization (e.g., MCO, community service provider) and for which the practice has complete screening data;</li> <li><input type="checkbox"/> How the practice confirms the screening results correctly identify all of the member's HRSN;, and</li> <li><input type="checkbox"/> How the practice obtains member consent to referrals to a resource or intervention.</li> </ul> <p><b>B. Upload</b> documentation on the practice's process to document screening and referral results in the practice EHR. The documents must include:</p>

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- The practice’s policies for appropriately documenting a positive screen in the EHR (e.g., if practice chooses to document the level of severity for an HRSN, it should be able to aggregate data to provide a yes/no assessment as to whether the member has a positive need).
- The practice’s process for documenting the components from 3A in the EHR.

**C. Attest**, through the TI 2.0 Application Portal once available in Fall 2024, that G and Z codes are utilized to document screening and referral details through claims by 9/30/2024. **Participants do not need to upload or provide documentation to validate unless there is a discrepancy.**

**D. Upload** documentation on the practice's process to protect data sharing and confidentiality. The documents must include:

- Information on which practice staff can access which level of data and how the practice periodically updates such access,
- Policies for how access to data may vary based on device (e.g., laptop, cell phone, paper records),
- Policies for how the practice protects data based on device (e.g., password protection policies for electronic data, locks to limit access to physical data),
- Details on permissible and impermissible use of data, and
- Information on how the practice communicates with members about its policies and procedures around maintaining the privacy and security of individual data.

**E. NCQA ONLY - Upload** documentation that the practice expects will satisfy the requirements for:

- NCQA HE 2.F (Privacy Protections for Data), detailing:
  - activities completed
  - activities to be completed
  - key milestones
  - key dates for completion
- NCQA HE 2.G (Notification of Language Services), detailing:
  - activities completed
  - activities to be completed
  - key milestones
  - key dates for completion

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AHCCCS will confirm it meets other milestone elements (at minimum) and provide suggestions for what additional documentation NCQA may be looking for.

**F. Upload documentation on the practice's processes to maintain a registry of community service providers. If the organization is using the Arizona CommunityCares system or another CLRS, upload:**

- A signed scope of work to use of the Arizona CommunityCares closed loop referral system or attestation that all members are covered under an MCO, ACO, or CIN with a sponsored closed-loop referral system (i.e., the system's resources are maintained by an external entity) automatically satisfies this criteria.

**G. If the organization is not using the Arizona CommunityCares system, upload:**

- Signed attestation from a senior practice leader that the practice has developed and is actively maintaining a registry of CBOs in the practice service area. The practice should upload the most recent registry of CBOs with the attestation.
- A current copy of the CBO registry.
- The practice's process for selecting community service providers with which to establish agreements. The documents must, at a minimum, include a description of how the practice performs assessments of:
  - whether the community service provider delivers services that address social needs that are prevalent within the practice population,
  - whether the community service provider has the capacity and capability to serve the practice's members, and
  - whether the community service provider delivers specialized services for a specific subpopulation that aligns with the provider's member population (note: it may not always be feasible to select such partners).

\*Participants are not required to satisfy 3G if using CommunityCares for this milestone.

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Core Component	Review Criteria
<p><b>4 - Connect to and demonstrate effective use of the statewide closed loop referral system (CommunityCares), or other closed loop referral system(s) that can report referral-level information</b></p>	<p><b>A. Upload</b> the practice's CommunityCares scope of work and onboarding plan. Documentation must include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The plan and timeline for onboarding the practice onto the platform (e.g., establish legal partnerships, create user accounts, develop custom reports and/or screening tools) and</li> <li><input type="checkbox"/> The plan and timeline for training providers on how to use the platform and troubleshooting any issues that arise with the platform (e.g., issues making or checking the status of a referral).</li> </ul>
	<p><b>B. Upload</b> a signed attestation from senior practice leadership (e.g., medical lead, financial lead, lead executive, or other practice leadership) that team members have accounts to log into CommunityCares. Must include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The name(s) and title(s) of practice team member(s) who have accounts to log into CommunityCares,</li> <li><input type="checkbox"/> The name and title of the individual who will serve as the administrator responsible for generating reports using CommunityCares data, and</li> <li><input type="checkbox"/> The name, role, and signature of the senior practice leader.</li> </ul>
	<p><b>C. Upload</b> documentation identifying the team member(s) responsible for utilizing the administrative functions of CommunityCares, including:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Periodically updating information about practice operations: <ul style="list-style-type: none"> <li><input type="checkbox"/> team member(s) responsible,</li> <li><input type="checkbox"/> the frequency of these updates,</li> <li><input type="checkbox"/> the specific data the practice updates, e.g., office hours, including weekend and after-hours availability, address, telephone number, service offerings (e.g., primary care, behavioral health care),</li> <li><input type="checkbox"/> cultural and linguistic capabilities, including languages (including American Sign Language) offered by the practice, either by providers or skilled medical interpreter (indicate if the interpreter is onsite or offsite), availability to accept referrals),</li> <li><input type="checkbox"/> website URL, and</li> <li><input type="checkbox"/> whether the practice location has accommodations for individuals with physical disabilities, including in offices, exam room(s), equipment.</li> </ul> </li> <li><input type="checkbox"/> Generating reports:</li> </ul>

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- team member(s) responsible
- the types of reports that the practice generates (e.g., most common member needs, number of types of referrals made, individuals who are making referrals, referral status), and
- the frequency each report is generated.

**D. Upload** documentation that describes the practice's policies and procedures for using CommunityCares and/or other MCO, ACO, or CIN HRSN referral programs, as appropriate to make electronic service referrals to CBOs. Documentation must include:

- How to request and document consent from patient to share information and refer to CBO for services;
- Description of explanation to member/family/caregiver of steps to expect once a referral is made;
- Description of practice process for making electronic referrals, including determining the need for referral based on screening results, member/family/caregiver consultation and consent, practice team member responsible for making referral, practice workflows for making and documenting referrals
- Description of process upon notification of fulfillment from CBO, including how the information will be transmitted to the practice and process for documenting referral into member's EHR.
- If using a system other than CommunityCares:** Documentation of processes to send referral data to AHCCCS, including: AHCCCS ID, date screened, screening results, referral to (community service provider), referral date, referral method (e.g., telephone), and current referral status.
- If leveraging an MCO, ACO, or CIN referral program reports:** Documentation of an implemented data sharing agreement and processes for the entity to send screening and referral data, as described above, to AHCCCS on a monthly basis by 4/30/2025.



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<b>Core Component</b>	<b>Review Criteria</b>
<p><b>5 - Identify health inequities prevalent within the population attributed to the practice and implement plans to reduce them</b></p>	<p><b>A. Submit</b> a completed AHCCCS Health Equity Collaboration Analysis using the template provided by AHCCCS via <a href="#">Google Form</a> or submitting the <a href="#">completed xls</a> to TargetedInvestments@azahcccs.gov. <b>Due 5/31/2024.</b></p>
	<p><b>B. NCQA ONLY - Submit</b> an update on compliance with all required HE Accreditation elements applicable to providers as listed on the formal gap analysis and any relevant information related to the gap analysis, including initial findings, key dates, completed activities, remaining activities, etc. <b>Due 7/31/2024.</b></p> <p><b>AHCCCS will provide the template before July, 2024.</b> Participants can prepare by reviewing the NCQA Gap Analysis tool in the NCQA IRT portal. NCQA will demonstrate how to use the IRT portal in a workgroup this May.</p>
	<p><b>C. Upload</b> documentation that demonstrates the practice's process for collecting, documenting and maintaining member-reported demographic data for race/ethnicity, primary language, disability status, geography, sex assigned at birth, gender identity and sexual orientation. The documents must include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Process for collecting these data from members (i.e., when data are being collected, where data are being collected, how data are being collected, who collects the data, the questions and/or script being used to collect the data, which should include an explanation to the member of why the data are being collected, how data will be used, how it will not be used, and with whom it will be shared and for what purpose(s)),</li> <li><input type="checkbox"/> Processes for reconciling differences in the member's EMR between the most recent member-reported data vs. data reported by AHCCCS and/or health plans,</li> <li><input type="checkbox"/> Procedures for sharing demographic data with members of the care team (i.e., information on which practice staff can access which level of data, how access to data may vary based on device, how the practice protects data based on device, permissible and impermissible use of data and how the practice communicates with members and updates its policies and procedures related to data sharing and confidentiality), and</li> </ul>

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- Screenshots of the fields in the practice EHR and intake forms to document each of the demographic variables for which the practice collects data, including the question format as well as the member response options for each variable, confirming:
  - response options align with statewide data standards where specified by AHCCCS and
  - if applicable, the timeframe in which changes will be made to align with these standards.

**AHCCCS will define these standards consistent with Federal and State guidance in the Summer, 2024.** Participants will have a reasonable timeframe to implement these changes.

**D. NCQA Only - Upload** documentation that the practice expects will satisfy the requirements for:

- NCQA HE 2.A (Systems for Individual-Level Data), detailing:
  - activities completed
  - activities to be completed
  - key milestones
  - key dates for completion
- NCQA HE 2.B (Factor 1) [Collection of Data on Race/Ethnicity - Direct Collection of Data from All Individuals], detailing:
  - activities completed
  - activities to be completed
  - key milestones
  - key dates for completion
- NCQA HE 2.C (Factor 1) [Collection of Data on Language - Direct Collection of Language Needs from All Individuals], detailing:
  - activities completed
  - activities to be completed
  - key milestones
  - key dates for completion
- NCQA HE 2.D (Collection of Data on Gender Identity), detailing:
  - activities completed
  - activities to be completed

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- key milestones
- key dates for completion
- NCQA HE 2.E. (Collection of Data on Sexual Orientation), detailing:
  - activities completed
  - activities to be completed
  - key milestones
  - key dates for completion

AHCCCS will confirm it meets other milestone elements (at minimum) and provide suggestions for what additional documentation NCQA may be looking for.

**E. Upload** documentation that demonstrates the practice’s policies and procedures for stratifying performance on quality incentive measures using clinical data stratified by (a) member-reported demographic data (i.e., the variables specified in milestone 5.C) and/or (b) HRSN data collected in milestone 3 in the practice EHR. Practices should report stratified performance for all subpopulations, regardless of the size of the denominator. Documentation must include:

- Description of the source of referenced data (e.g., EMR, MCO gap-reports), including:
  - frequency of receiving the data
  - processes to pull or otherwise receive the data
- Description of how, if more than one source is used, the data are matched from one system to another (i.e. “primary index”)
- Description of how stratified metrics are generated (e.g., which EMR report)
- If an ACO/CIN is assisting the practice with this effort, describe:
  - how each ACO/CIN supports the clinic for mutual members
  - how the practice completes this effort for AHCCCS members not enrolled with the ACO/CIN.

**F. NCQA Only - Upload** documentation that the practice expects will satisfy the requirements for:

- NCQA HE 6.A (Reporting Stratified Measures), detailing:
  - activities completed
  - activities to be completed
  - key milestones
  - key dates for completion

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NCQA HE 6.B (Use of Data to Assess Disparities), detailing:

- activities completed
- activities to be completed
- key milestones
- key dates for completion

AHCCCS will confirm it meets other milestone elements (at minimum) and provide suggestions for what additional documentation NCQA may be looking for.

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Core Component	Review Criteria
<p><b>6 - Identifying and engaging caregiver(s) and guardian(s) of a newborn to screen for anxiety and depression and coordinate with appropriate behavioral health provider(s) and/or case manager(s) to follow-up.</b></p>	<p><b>A. Upload</b> documentation describing how the practice identifies members who are pregnant or who are new parents, including identification of the birthing parent.</p> <p><b>Submit</b> written documentation of processes the practice employs to notify the member's health plan that a member is pregnant or a new parent, including indication of when the member was the birthing parent.</p>
	<p><b>B. Submit</b> written documentation of policies and procedures that describe the practice's process for ensuring members receive a follow-up appointment within 84 days of childbirth. Documentation must include:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Description of how the practice is informed that the member has given birth;</li> <li><input type="checkbox"/> Description of member outreach following the birth of a child to schedule a follow-up appointment, including how the practice makes multiple attempts at contacting the member using different outreach methods (e.g., phone call, text, mail), and accommodations for members who need to bring newborn/infant to appointment (e.g., separate waiting room for newborns);</li> <li><input type="checkbox"/> Description of the process for reminding member of upcoming appointment;</li> <li><input type="checkbox"/> Description of the process for following up with member if the individual(s) do not show for appointment, including rescheduling appointment.</li> </ul>
	<p><b>C. Upload</b> documentation that describes the practice's processes for completing the following activities:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Developing, maintaining, and updating a registry of behavioral health providers who can meet a need identified from the screening, including name, credentials, including certifications, address, availability of in-person and/or telehealth services, website (as applicable), languages spoken by the provider, availability of skilled interpreter services;</li> <li><input type="checkbox"/> -Providing caregiver(s)/guardian(s) with a copy of the registry of behavioral health providers who can support an identified need;</li> <li><input type="checkbox"/> Obtaining and documenting information regarding status of behavioral health providers Perinatal Mental Health Certification status and communicating status in registry provided to caregiver(s)/guardian(s);</li> </ul>

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- Obtaining and documenting information regarding insurance accepted by behavioral health providers on the registry and communicating that information to caregiver(s)/guardian(s);
- The registry should include behavioral health providers who are 1) accepting new patients, and 2) are able to see a new patient consistent with the standards in ACOM 417.
- Submit** current copy of registry of behavioral health providers, including name, credentials, address, availability of telehealth services, website (as applicable), languages spoken by the provider, availability of skilled interpreter services.

**D. Submit** written documentation of care coordination and referral protocols for when member(s)/caregiver(s)/guardian(s) screens positive for anxiety and/or depression. Documentation must include protocols and processes with the following entities/providers:

- AHCCCS Health Plans;
- Behavioral health providers, including the practice's processes for prioritizing care coordination and referral to behavioral health providers with Perinatal Mental Health Certification and Perinatal Mental Health Certification for Pharmacological interventions. Description should include processes for sending and receiving referrals, timelines for outreach to caregiver(s)/guardian(s), communication regarding status of referral, and documentation in the member's medical record;
- Care managers and/or case managers to communicate and document screening results and referral.

Documentation must include:

- Description of the referral process to a behavioral health provider upon identification of a need, including the warm handoff process within the practice, as applicable, including individual(s) within the practice who are making referrals;
- Practice's process for handling crises, including individual(s) within practice with qualifications and credentials for identifying, managing, and referring members in crisis;
- Processes for sharing information among entities, including communication with the member caregiver(s)/guardian(s) about how information is shared, with whom, and how it is used;
- Process for obtaining consent from member's caregiver(s)/guardian(s) to complete screening and refer for additional services for identified needs;

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- Process for consulting with other providers based on identified need(s) and screening results, including specifically process for consulting with psychiatric providers with expertise in perinatal care, with preference for those certified in PMH;
- Description of how the practice will prioritize referrals to practitioner or prescriber certified in PMH and qualified to diagnose and treat anxiety and depression when possible, including how the practice maintains a list of certified practitioners and prescribers, establishes referral processes with those and other providers, and receives notification from those and other providers when a referral is complete;
- Process for documenting referral information in member's medical record;
- Written materials, scripts, or other educational materials the practice uses with member's caregiver(s)/guardian(s) to discuss referral process steps, transportation assistance, as available.