

September 13, 2017

Shawn Nau Chief Executive Officer Health Choice Integrated Care 1300 South Yale Street Flagstaff, AZ 86001

**RE:** Provision of Special Assistance – Corrective Action Plan Acceptance

Dear Mr. Nau:

The Arizona Health Care Cost Containment System, Division of Health Care Management (AHCCCS) has reviewed Health Choice Integrated Care's (HCIC) Corrective Action Plan (CAP) regarding the Provision of Special Assistance submitted on August 9, 2017.

Based on this review, the Provision of Special Assistance CAP is **approved contingent** upon the following required changes:

- HCIC referenced AHCCCS staff names in the 'SpecA Desktop Protocol' document, these names must be replaced with 'AHCCCS Office of Human Rights'.
- The 'SpecA Desktop Protocol' states: "On a monthly basis, Lia Ballesteros (OHR Lead Advocate) will email the HCIC Special Assistance SME the HCIC-GSA7 SpecA Rpt [month/year] which includes a scanned copy of the original Part A, Part B/Does Not Meet Criteria, Updated Part B, and/or Part C."

AMPM 320 R.F. 3. requires: The Contractor and TRBHA must, by the 10th calendar day of each month, provide the OHR with a comprehensive report listing: a. All persons in need of Special Assistance who are active as of the end of the previous month, b. Any Part C notifications during the previous month that a person no longer needs Special Assistance, c. Any persons transferred to the Contractor or TRBHA during the previous month who were Special Assistance in the previous Contractor or TRBHA, and d. Any person in need of Special Assistance transferred from the Contractor or TRBHA to another Contractor or TRBHA. Currently, the AHCCCS OHR only sends copies of returned Part B (and Does Not Meet Criteria), updated Part B, and Part C notifications to the SME and does not attach the notifications to any monthly email or list to the RHBA. The Contractor's references to AMPM 320 R.F. 3 in its desktop protocol must be revised.

The desktop also states: "If the Health Home/provider notifies the HCIC Special Assistance SME of an update that needs to be made, (s)he will be directed to OHR and the HCIC SME will not update the Special Assistance List until a secured email is received from OHR/Lia." It is unclear how HCIC is defining "an update that must be made". Monthly reports from HCIC should include all of the updates that AHCCCS requires. In addition, HCIC should clarify how the Health Home/provider will inform the AHCCCS OHR of the update; whether by Email or fax.

AHCCCS will monitor monthly reporting for resolution of issues and compliance. As a reminder, HCIC is required to submit quarterly CAP updates of its provider audit results no later than 30 days after the end of each quarter, with the initial submission due on September 30, 2017. Quarterly CAP submissions will be required until AHCCCS determines HCIC and its subcontracted providers have met and sustained compliance with Contract requirements. Failure to comply with these requirements may result in additional compliance actions.

Finally, AHCCCS would like to meet with HCIC to offer technical assistance and guidance regarding the CAP and issues identified above. This meeting can be held on a date/time that is convenient for both parties. AHCCCS will reach out to arrange.

We appreciate HCIC's cooperation in addressing the identified issues concerning this matter. Should you have any questions, please contact CJ Loiselle at (602) 417-4659 or CJ.Loisell@azahccs.gov with a copy to Lola Davis, Operations and Compliance Officer, at: Lola.Davis@azahcccs.gov. Thank you.

Sincerely,

Christina Quast

Operations Administrator

AHCCCS Division of Health Care Management

Cc: Nicole Larson, HCIC

CJ Loiselle, AHCCCS

Dana Hearn, AHCCCS

Virginia Rountree, AHCCCS

Michelle Holmes, AHCCCS

Lola Davis, AHCCCS