

## NOTICE OF PUBLIC INFORMATION

- 1. Name of the Agency:** Arizona Health Care Cost Containment System (AHCCCS)
- 2. The topic of the public information notice:** Behavioral Health Demographic Data Submission Workgroup
- 3. The public information relating to the topic:**

**a.** The Arizona Health Care Cost Containment System (AHCCCS) and the Arizona Department of Health Services Division of Behavioral Health Services (ADHS/DBHS) have collaborated with Arizona's Regional Behavioral Health Authorities (RBHAs), Tribal Regional Behavioral Health Authorities (TRBHAs), contracted behavioral health providers and representatives from the Arizona Council of Human Service Providers to form a *Behavioral Health Demographic Data Submission Workgroup*. The workgroup has been tasked with advancing system efficiency by examining the administrative demands of the behavioral health demographic submission process and pursuing opportunities for improvement. Although the workgroup's activities are far from complete, the team has presented a formal recommendation to AHCCCS's *Quarterly Reporting Requirements Executive Steering Committee* and we are now seeking public comments; including identification of any potential concerns or voicing support related to the workgroup's recommendation to streamline reporting.

**b. ISSUE:**

Within the behavioral health system, required data demographic submissions frequently error out due to system edits that restrict any submission of information to a unique "episode of care" for each person served. The episode of care construct is designed to support coordination of behavioral health data submissions by defining the entity responsible for submitting that data during a designated period of time; creating a structure to examine individual outcomes within that defined episode of care. However, in an evolving health care service delivery system, the workgroup believes this prescribed construct creates delays in acquiring meaningful data since updates cannot be submitted until past submissions clear all edits; issues that translate into providers and RBHAs "working" demographic submissions of data that reflect a person's status months or even years in the past. Current data on an individual engaged by the system of care cannot be submitted until past demographic data submissions associated with the episode of care are resolved and a new episode of care cannot begin until past episodes are formally closed out by past service providers. Given the data limitations that come from these challenges, the State of Arizona has moved away from reporting service utilization by population members with an open episode of care to an enrolled and served methodology. The *Behavioral Health Demographic Data Submission Workgroup* created the following recommendation:

**c. INITIAL WORKGROUP RECOMMENDATION:**

Eliminate the episode of care (EOC) construct and evaluate impact. The proposed change would apply to any demographic data submission sent for processing regardless of the date of the demographic data. This will require that AHCCCS, DBHS and, in some cases, the contracted RBHAs:

- Identify and remove/suspend data validation edits in fields that require a single “episode of care” in the behavioral health demographic data set;
- Communicate to all impacted entities that these validation edits have been removed/suspended;
- Process demographic submissions and evaluate impact of the change in areas that include but are not limited to (a) ability to acquire current and meaningful data, (b) analyze data received in the data demographic submissions and (c) reduce administrative demand on system partners; *and*
- Report back to the Executive Steering Committee on the outcome of this pilot period to determine if the episode of care construct should be fully removed as part of ongoing demographic redesign efforts.

**d. Implementation Date:**

AHCCCS is targeting implementation of these changes during the second half of February 2016 pending information received during this public comment process.

We thank you for your ongoing partnership to provide comprehensive, quality health care for those in need across Arizona.

**e. Submission of Comments:**

Please submit by email any desired comments to [demographic@azahcccs.gov](mailto:demographic@azahcccs.gov) or in writing to the address below by close of the comment period, 5:00 p.m. on January 29, 2016:

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