January 18, 2022

The Honorable Douglas A. Ducey  
Governor of Arizona  
State Capitol  
1700 West Washington  
Phoenix, AZ 85007

The Honorable Karen Fann  
Arizona State Senate  
1700 West Washington  
Phoenix, AZ 85007

The Honorable Russell Bowers  
Speaker of the House  
Arizona House of Representatives  
1700 West Washington  
Phoenix, AZ 85007

Dear Governor Ducey, President Fann, and Speaker Bowers:

In accordance with the A.R.S. §36-2907.14 and §36-2907.15, please find the enclosed report regarding the Outpatient Treatment Program (OTP) Plan Reporting and 24/7 Access Point Standards. Do not hesitate to contact me at (602) 417-4458 if you have any questions or would like additional information.

Sincerely,

Jami Snyder  
Director
BACKGROUND

Per Arizona Revised Statute § 36-2907.14, the Administration and its contractors may reimburse an Opioid Treatment Program provider for enrolled members only if the provider demonstrates enforcement of each plan contained in the annual report. Additionally, § 36-2907.15 indicates that the Administration and the Department of Health Services shall establish standards for designating centers of excellence for treating opioid use disorder statewide.

SUMMARY

Opioid Treatment Program Reporting

A.R.S. § 36-2907.14 requires all currently established Opioid Treatment Program providers (OTP) receiving Medicaid funding to submit an annual report to the Arizona Health Care Cost Containment System (AHCCCS). Additionally, those providers interested in establishing new OTPs are required to submit reports for review in order to receive AHCCCS funding. This reporting requires that providers supply the following:

1. A security plan
2. A neighborhood engagement plan
3. A comprehensive patient care plan
4. A community relations and education plan
5. A diversion control plan

In November, AHCCCS received 52 plans from OTPs registered with AHCCCS and began reviewing the submissions. This year’s submissions were all timely, complete, and none required additional technical assistance. All plans, and corresponding information submitted by the OTPs were determined to be sufficient. Additionally, each provider was officially notified of the sufficiency of the information supplied relative to the reporting requirements on January 7, 2022.

24/7 Access Points (previously known as Centers of Excellence)

As stipulated in A.R.S. §36-2907.15, AHCCCS and the Arizona Department of Health Services (ADHS) were required to develop standards for the designation of Centers of Excellence, now referred to as 24/7 access points, for treating opioid use disorders statewide. AHCCCS and ADHS worked to develop the standards that included, but are not limited to, those outlined in the legislation. Additional requirements were added to ensure increased clinical and care
coordination in alignment with the AHCCCS integrated, whole person-centered care model. These standards are identified in Appendix A.

The 24/7 access point standards were finalized in December 2019 and posted to the AHCCCS website. AHCCCS contracted health plans received the final standards for contracting and oversight of their provider networks. The 24/7 access point providers listed on the AHCCCS website meets the required standards. Additionally, on January 4, 2021, Community Medical Services transitioned its 24/7 access point services to a new location in Phoenix. Community Medical Services and the other 24/7 access point providers are listed in Appendix B.

With Governor Ducey’s March 11, 2020, Declaration of Emergency and Executive Order regarding the pandemic, OTPs, inclusive of the 24/7 access points, worked closely with the State Opioid Treatment Authority (SOTA) to ensure continued services for those in need. Modifications to services and requirements were made in alignment with the Substance Abuse and Mental Health Administration’s (SAMHSA) expectations, including the provision of services via telehealth options, curbside dosing, and additional annual reporting requirements. As the public health emergency has remained in effect throughout 2021, the modifications set forth in collaboration with SAMHSA also continue to be in effect.

Additionally, the statewide learning collaborative activities between the 24/7 access point providers that were previously suspended in 2020 due to the public health emergency were re-established in a virtual environment. These collaboratives included the AHCCCS contracted Regional Behavioral Health Authorities that have contracts with 24/7 access point providers, the contracted 24/7 access point providers, and AHCCCS staff. New collaborative, virtual meetings began in April of 2021 and recurred every two months. These collaborative meetings have been focused on the continued discussion on the differences of 24/7 access points versus traditional Opioid Treatment Programs, current staffing needs during the pandemic, ongoing community outreach strategies, and best practices for open access to the community.
APPENDIX A

Standards for 24/7 access points

- Must have obtained AHCCCS approval for each plan identified within A.R.S. 36-2907.14.
- Provides a 24/7 access point for individuals with Opioid Use Disorder (OUD) to receive immediate connection to Medication Assisted Treatment services inclusive of morning, afternoon, evening, and late evening dosing hours.
- Provides all three FDA approved medications for Medication Assisted Treatment (MAT) (methadone, Buprenorphine, Naltrexone) or be able to demonstrate dedicated partnerships with other providers in the community for warm handoffs that will occur the same day.
- Provides individuals seeking OUD treatment access to psychosocial and recovery support services as a part of the (MAT) model. This shall be demonstrated with on-site 24/7 access point staff who are licensed general counselors and certified Peer Support Specialists.
- Must demonstrate ability to provide and review information regarding Opioid Treatment Program Providers and Facilities with potential and current members and identified family members interested in treatment.
- Must demonstrate ability to provide and review information regarding office-based opioid agonist treatment providers.
- Directly provides, or can demonstrate a direct relationship with identified partners, for whole person care through an integrated model, to address behavioral health and physical health needs.
- Must conduct ongoing clinical assessments of patients through a multidisciplinary treatment planning process that indicates services and care levels through a person-centered approach.
- Utilize ongoing review strategies to identify and prepare patients for graduation from 24/7 access points to other outpatient services. Provider must share with patient the goal of graduation to include:
  a. Transition to OTP and other MAT providers in the community,
  b. Transition to other outpatient primary care providers in the community through coordination with health plan and warm hand off to new provider,
  c. Transition to other outpatient counseling services in the community through coordination with health plan and warm hand off to new provider.
- Provider must demonstrate the ability to provide reporting on:
  a. Treatment capacity,
  b. Quality of care metrics,
  c. Patient outcomes, and
  d. Member satisfaction.
- Provide must participate in statewide learning collaborative focused on:
  a. Sharing of best practices and
  b. Peer-to-peer support between 24/7 locations.
APPENDIX B

24/7 Access Point Providers

CODAC Health, Recovery and Wellness
380 E. Ft. Lowell Road, Tucson, AZ 85705
520-202-1786

Community Bridges, East Valley Addiction Recovery Center
560 S. Bellview, Mesa, AZ 85204
480-461-1711

Community Medical Services
2806 W. Cactus Road, Phoenix, AZ 85029
602-607-7000

Intensive Treatment Systems, West Clinic
4136 N. 75th Ave #116 Phoenix, AZ 85033
623-247-1234