

September 27, 2023

Administrator Chiquita Brooks-LaSure  
U.S. Centers for Medicare and Medicaid Services  
7500 Security Boulevard Baltimore, MD 21244

RE: AHCCCS 1115 Demonstration Waiver Amendment Request - Parents as Paid Caregivers

Dear Administrator Brooks-LaSure:

On behalf of the State of Arizona and the Arizona Health Care Cost Containment System (AHCCCS), I am pleased to submit the enclosed application for Arizona's Parents as Paid Caregivers (PPCG) demonstration waiver proposal under Section 1115 of the Social Security Act. Arizona's current 1115 waiver is in place through September 30, 2027, and if approved, this amendment will run concurrently with AHCCCS' requested renewal period through September 30, 2027.

Arizona has long demonstrated its commitment to innovation in Medicaid. Building on that history and experience, the Parents as Paid Caregivers for minor children Amendment is designed to continue critical components of the existing Appendix K PPCG program to help mitigate the direct care worker shortage, increase member satisfaction, and extend an additional family support service to restore, enhance, and maintain family functioning.

The initiatives proposed in this waiver request were informed by a robust public input process. AHCCCS engaged 1,765 stakeholders during the tribal consultation and public notice process, obtaining input from the State Medicaid Advisory Committee, OIFA Advisory Committee, community members participating in two virtual public forums, and tribal representatives during Tribal Consultation. In addition, stakeholders supplied 1,588 verbal and written responses offering support, recommendations, and personal experiences which informed changes to create the following proposal.

Thank you again for your consideration of the Parents as Paid Caregivers waiver request. We appreciate your shared commitment to the innovations advanced in the proposal and your recognition of the positive impact this can have on the health and wellness of those served by AHCCCS.

Sincerely,



Carmen Heredia

Executive Deputy Director, AHCCCS

CC:

Daniel Tsai, Deputy Administrator and Director, Centers for Medicaid & CHIP Services

Anne Marie Costello, Deputy Director, Center for Medicaid & CHIP Services

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Zaida Dedolph, Senior Policy Advisor, Arizona Governor's Office



## **Arizona Section 1115 Waiver Amendment Request: Parents as Paid Caregivers**

**September 27, 2023**



## Table of Contents

I. SUMMARY	2
II. OVERVIEW	3
III. WAIVER AMENDMENT PROPOSAL DETAILS	6
IV. REQUESTED WAIVER & EXPENDITURE AUTHORITIES	6
V. EVALUATION DESIGN	7
VI. PUBLIC NOTICE PROCESS	8
VII. BUDGET NEUTRALITY	9
VIII. APPENDIX	10



## I. SUMMARY

The Arizona Health Care Cost Containment System (AHCCCS) is requesting an amendment to the State's current Demonstration project, "Arizona Medicaid Section 1115 Demonstration" under section 1115 of the Social Security Act (Project Number 11-W-00275/9). In response to the COVID-19 Public Health Emergency (PHE), AHCCCS submitted and received approval for an Appendix K waiver amendment to allow for certain flexibilities to their program, including payments to parents who serve as paid caregivers for minor children. The goal of this proposal is to better address the direct care worker (DCW) shortage by permanently extending payments to parents who serve as paid caregivers for minor children while also further developing the Arizona Long Term Care System (ALTCS) to include extended family supports to preserve a supportive home environment and mitigate access to care challenges.

Since 1982, AHCCCS has been delivering high-quality, cost-effective health care services to Arizonans via a managed care delivery system authorized through an 1115 waiver. In 1988, AHCCCS' original 1115 Demonstration was substantially amended to allow Arizona to implement ALTCS for individuals who are elderly and/or have physical disabilities and individuals with intellectual/developmental disabilities. Since that time, the ALTCS program has evolved by creating an array of home and community based settings and services to support members to live in the least restrictive setting while still receiving the appropriate care. The program has continued to grow to over 65,000 members in July of 2023 with approximately 89 percent of members receiving HCBS. The ALTCS program includes a flexible service delivery model whereby spouses and family members (including parents of adult children) can provide paid authorized services within the member's own home. Prior to COVID-19, parents of minor children had never been paid for the care they provided to their minor child.

The COVID-19 Public Health Emergency (PHE) necessitated new innovations and service delivery models to ensure members continued to receive services if the family decided not to allow DCWs into their homes or if DCWs decided not to continue working in the home setting to mitigate the risk of exposure. As a result, AHCCCS submitted and received approval for a temporary Appendix K PHE flexibility to allow parents to be reimbursed for the provision of the "extraordinary care" that was required of them throughout the course of the pandemic. The agency received an extension of this flexibility for six months after the end of the PHE on March 22, 2023, extending the program until November 11, 2023, under the same Appendix K authority. As defined in AHCCCS' 1115 Waiver, "extraordinary care," is defined as "care that exceeds the range of activities that a [parent] would ordinarily perform in the household on behalf of the recipient [member], if he/she did not have a disability or chronic illness, and which are necessary to assure the health and welfare of the enrollee, and avoid institutionalization." The State is seeking to ensure the continuation of allowing for parents to be reimbursed for the provision of this "extraordinary" attendant care and habilitation services to their minor children past the current expiration date of November 11, 2023, through a section 1115 Demonstration amendment.

Under this Demonstration proposal, the agency will seek to:

- Mitigate DCW shortage and other access to care challenges by allowing payments to parents who serve as paid caregivers for their minor children,
- Increase member satisfaction and promote positive health and well-being outcomes for the target population,
- Extend an additional support service to restore, enhance, and maintain family functioning to preserve effective care for the member in the home and community, and

- Ensure that members receive high-quality care while increasing timely accessibility to care providers.

## II. OVERVIEW

### Background

On March 13, 2020, the President of the United States declared the 2019 novel coronavirus (COVID-19) a nationwide emergency pursuant to Section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5207 (the “Stafford” Act). The President’s declaration provided authority for the Secretary of the U.S. Department of Health and Human Services to enhance States’ ability to respond to the COVID-19 outbreak, including the power to temporarily waive or modify Medicaid and CHIP requirements under Section 1135 of the Social Security Act. Temporary flexibilities were granted through policy changes or various legal authorities.

To minimize disruption in care for AHCCCS members requiring home and community-based services (HCBS) during the course of the PHE, Arizona requested and received approval via an Appendix K amendment which allowed parents of minor children to receive payment for attendant care and habilitation services. Most recently, Arizona obtained an extension of this Appendix K amendment currently set to expire six months after the end of the public health emergency on November 11, 2023. Upon careful review of this authority with Agency staff and external stakeholders, AHCCCS has determined the need to make payments to parents of minor caregivers an on-going flexibility within the State’s Section 1115 Research and Demonstration Waiver.

### Addressing Arizona’s Workforce Shortage Through Temporary Flexibilities

Prior to the PHE, Arizona experienced overall workforce shortages in the state. These shortages were further exacerbated by the PHE and are particularly pronounced for DCWs delivering services in HCBS settings.<sup>1</sup> Further complicating matters, there is a nationwide shortage of in-home caregivers due to rising demand for services related to the aging population<sup>2</sup>. In Arizona, this translates to potentially 41,000 new and available jobs for direct-care workers over the next seven years to help meet demand.<sup>3</sup> A workforce survey of DCWs conducted by the Paraprofessional Healthcare Institute (PHI) in 2021 estimated that Arizona providers will need to fill nearly 130,000 job openings from 2016.<sup>4</sup>

As the PHE continued, the DCW workforce challenges were exacerbated and the system became more reliant on parents providing authorized paid care, while parents became increasingly accustomed to the care being delivered in this way. As a result, when ARP Section 9817 funding became available AHCCCS decided to continue this PPCG flexibility through September 30, 2024 using the Section 9817 funds to provide an additional runway for parents, case managers, and the provider agencies representing the DCW workforce to prepare for this flexibility to end and make plans for this transition to mitigate any potential access to care risks. Outside of extending PPCG, AHCCCS prioritized the use of the ARP funding

<sup>1</sup> Watts, M., Musumeci, M., Ammula, M. 2021. *State Medicaid Home & Community-Based Services (HCBS) Programs Respond to COVID-19: Early Findings from a 50-State Survey*. Kaiser Family Foundation. <https://www.kff.org/report-section/state-medicare-home-community-based-services-hcbs-programs-respond-to-covid-19-early-findings-from-a-50-state-survey-issue-brief/>

<sup>2</sup> MACPAC. 2022, March. *State Efforts to Address Medicaid Home-and Community-Based Services Workforce Shortages*. [https://www.azahcccs.gov/shared/Downloads/News/2022/220322\\_MACPAC-brief-on-HCBS-workforce.pdf](https://www.azahcccs.gov/shared/Downloads/News/2022/220322_MACPAC-brief-on-HCBS-workforce.pdf)

<sup>3</sup> Duarte, C., 2019, February 10. *Shortage of Home-Care Workers in US, Arizona called a ‘Growing Crisis’*. Arizona Daily Star. [https://tucson.com/news/local/shortage-of-home-care-workers-in-us-arizona-called-a/article\\_f3acc21a-f915-593d-b0fa-d207080a3680.html](https://tucson.com/news/local/shortage-of-home-care-workers-in-us-arizona-called-a/article_f3acc21a-f915-593d-b0fa-d207080a3680.html)

<sup>4</sup> Campbell, Stephen. *Insights From the Frontline: Results of a Statewide Survey of Paid Caregivers in Arizona*. Paraprofessional Healthcare Institute (PHI), 2021.

to develop a multi-pronged approach to address recruitment and retention of DCWs to bolster the workforce to assume the provision of care after the conclusion of the flexibility. These strategies were informed by the HCBS stakeholder community as well as the 2021 PHI survey findings suggesting opportunities to support paid caregivers through additional compensation, training, supervision, and opportunities for advancement and support. The multi-pronged approach includes the following activities:

- Time limited directed provider payments to support recruitment and retention efforts,
- Develop new or additional trainings, including specialized trainings as a way to promote workforce retention,
- Support the career pathway of a DCW by promoting transparency on how to begin a career as a DCW and provide administrative resources to encourage recruitment,
- Promote investments in the development of new tools and technologies, such as a workforce database that helps the agency monitor workforces across the state, including DCWs, and
- Expand existing processes and technologies in the state, such as home-grown training programs.

### **Seeking Payment to Parents as Paid Caregivers Permanently**

Addressing workforce shortages needs to focus simultaneously on filling the current gaps as well as preparing for future membership growth to mitigate compounded shortages in the future. In recognition of these challenges, the Agency proposed numerous interventions and investments described above aimed at attracting and retaining the DCW workforce through its [Section 9817 ARPA Spending Plan](#), including payments to parents of minor children. However, over the course of implementing the aforementioned initiatives, based on stakeholder feedback and available data it became apparent to the State that the PPCG program continues to be a critical lifeline for children with complex needs (and their families) that AHCCCS serves. The anticipated workforce needs and projected increase in our ALTCS population, combined with the anticipated number of DCWs entering the workforce, creates a scenario where augmenting the DCW workforce in Arizona through this PPCG program is essential to ensuring members are able to receive the care they need.

Under this proposal, parents who do provide these services must meet all requirements as established by AHCCCS policy including being employed/contracted by an AHCCCS Registered Direct Care Service Agency, demonstrating competency to provide care including passing specific competency tests, and complying with Electronic Visit Verification (EVV) per the 21<sup>st</sup> Century Cures Act (Cures Act). The services and number of authorized hours will be assessed and determined through the Person-Centered Service Planning (PCSP) process including a determination of what services/hours will be provided by informal (uncompensated) supports. Additionally, the provision of informal supports must be voluntary on the part of the caregiver. AHCCCS will update the assessment tools to include a definition of the services and tasks that may be assessed for and qualify as “extraordinary care.”

Agencies employing or contracting with parents providing these services must maintain agency supervisory visits as further detailed in AMPM 1240-A. As part of the quarterly supervisory visits, a succession and workforce plan for the member/family shall be established, evaluated, updated, and implemented. The individual workforce development plan should include, at a minimum, planning for respite workers and contingencies should the parent be unable to provide care or fulfill their responsibilities as the caregiver. The member specific plans shall inform the agency’s broader workforce planning efforts to ensure they are responsive to member needs and preferences. Supervisory visits should also include an assessment of the well-being of the family member(s) and offer support/services/resources for any identified need.

In accordance with AHCCCS Medical Policy Manual (AMPM) Section 1620, case managers will review with a member/family members/Health Care Decision Makers (and other members of the service planning team) various service delivery models and utilize a decision tree to make an informed decision regarding the model that will best meet the member's needs, including decisions about the individuals who will serve as caregivers such as DCWs recruited by the agency and/or member/family, non-parental family members, and/or parents as a last resort when other options have been exhausted and when the parent is willing and able to provide the paid care.

Consistent with AHCCCS' ALTCS guiding principles, the person centered planning process should maximize member-direction and support the member to make an informed decision and lead/participate in the process to the fullest extent possible. Specifically, members will have an informed choice of providers and shall have the final say in who provides their care, including whether a parent or non-parent DCW serves as a paid caregiver. Case managers will document any selection of a member-directed service model option in the PCSP, including the option for parents of minor children to provide paid care. Unless medically contraindicated, the PCSP shall also include an individualized habilitation goal based upon the member's needs and preferences that affords the member interaction with peers in community settings.

Parents who provide these services must also maintain quarterly in-person case management visits as further detailed in AMPM 1620-E. Parents would be limited to 40 hours of paid care, per child, in a given week where paid care by a parent caregiver cannot exceed more than 16 hours in a single day. If two children are receiving direct care services (habilitation, attendant care, personal care, or homemaker services), the parent(s) may provide up to a combined 80 hours of paid care per week (40 hours for each child). The exact number of hours (up to 40 per child) approved for payment will be determined through the person-centered planning process and must meet medical necessity requirements. Although these hourly limitations are in place, members can still receive more than 40 hours of authorized paid care in a given week through the use of an alternate caregiver.

Currently, in Arizona, there are 277 members receiving over 40 hours of paid care from their parent providers out of the total 3,454 members with parent DCWs. In order to allow adequate time for families and provider agencies to prepare for the 40-hour limit, the state proposes to implement a phased-in approach for families already enrolled in the program who are currently providing care over the 40-hour limit. New families looking to enroll in the program will be subject to the 40-hour limitation starting on February 1, 2024. The phased-in approach for existing families will be implemented as follows:

1. From the time of approval until January 31, 2024: There will be no hourly limitations in place.
2. From February 1, 2024, until May 31, 2024: There will be an 80-hour per week limitation.
3. From June 1, 2024, to September 30, 2024: The hourly limitation will drop to 60 hours a week.
4. Beginning October 1, 2024, and thereafter: The 40-hour per week limitation will be in effect.

Providers will ensure they have active and implementable workforce plans that are reflective of their entire current membership needs irrespective of whether or not members are served by a parent DCW. Parents of minor children should only be considered for paid care as an alternative when all other options have been exhausted. This workforce plan will be considerate of recruiting and retaining an adequately trained and competent workforce that can meet their membership's unique healthcare and acuity needs and preferences.

### **Extend Family Support/Home Care Maintenance:**

As an auxiliary support to the PPCG proposal detailed above, the Agency is proposing to establish a home care training family support (family support) service as part of the HCBS benefit package detailed in "Attachment L" of the State's approved STC document (Project Number 11-W-00275/9) for the long-term care population on the basis of the institutional level of care criteria (age or disability) that qualifies them for long term services and supports. Family support is directed toward restoration, enhancement, or maintenance of the family functioning to increase the family's ability to effectively interact and care for the member in the home and community. This service provides critical supports to members and their caregivers for the purpose of learning about, navigating, and planning for implementation of their Person-Centered Service Plans (PCSP) and help to address the needs of the family member(s), who are providing compensated and uncompensated care, including challenges they face when coping with the member's health care condition(s) and related stress and isolation that accompanies continuous and daily care of the member. Currently, a comparable service is available to AHCCCS members with a behavioral health need under the rehabilitation benefit in the agency's State Plan. By extending this benefit to the long-term care population and expanding beyond just those with a behavioral health need, AHCCCS will be better positioned to preserve the supportive environment and sustain the likelihood of members remaining in their home, thereby mitigating access to care challenges and risks of the member's utilization of higher levels of care in order to have their needs met.

AHCCCS is seeking authority to provide family support to primary caregivers (providing compensated and uncompensated care) of children and adults enrolled in the Arizona Long Term Care System (ALTCS) program. The service will be provided by family members who have lived experience in supporting a family member enrolled in the ALTCS program and demonstrate competencies required to provide the service. Family support may involve activities such as assisting the family to learn skills related to adjustment to the member's disability or aging process or significant life events or transitions, enhancing and improving the health and well-being of the member and family unit, navigating the health care system, self-advocacy, development of natural supports and community support systems, participating in the PCSP development, and implementation of individual and family goals and long-term life planning.

Family support would be limited to ALTCS members who are residing at home and will not supplant case management services. Primary family caregivers are eligible for the service and that includes families created through birth, foster care, adoption, marriage, or a self-created family unit. The service will be authorized by the case manager with limits on the amount, frequency and/or duration specified in PCSP and based on assessed needs. The PCSP will include a specific assessment of the family members' physical and mental well-being and outline targeted goals for both the family member and the member specific to the family support service. Family support may be provided individually or in a group setting. Additionally, more than one provider agency may bill for family support provided to a member at the same time if indicated by the member's assessed needs as identified through their PCSP.

### **III. WAIVER AMENDMENT PROPOSAL DETAILS**

#### **A. Proposed Cost Sharing Requirements under the Demonstration as Amended:**

This Demonstration does not change the Medicaid benefit package design; there is no new cost-sharing, copayments, or coinsurance for any benefit provided under the waiver. State Plan benefits will continue to be applied in accordance with the State Plan and all eligibility groups will continue to receive all State Plan benefits.

**B. Proposed Changes to the Delivery System under the Demonstration as Amended:**

The delivery system for persons impacted by this proposed 1115 Waiver amendment will not vary from AHCCCS' current program features as described in the current State Plan and Demonstration.

**C. Proposed Changes to Benefit Coverage under the Demonstration as Amended:**

Through the Extended Family Support and Home Care Maintenance Demonstration, AHCCCS is seeking to add an additional benefit to the existing HCBS benefit package detailed in "Attachment L" of the State's approved STC document (Project Number 11-W-00275/9). The proposed service provides critical support to members and their caregivers to assist with the education, navigation, and implementation of their PCSPs to address the needs of the family members serving with the goal of restoring, enhancing, and maintaining family functioning.

**D. Proposed Changes to Eligibility Requirements.**

The Demonstration does not change the Medicaid benefit package design; there are no new eligibility requirements outside of those established as an eligible minor within ALTCS enrolled within Arizona's 1115 Demonstration Project.

## **IV. REQUESTED WAIVER & EXPENDITURE AUTHORITIES**

### **REQUESTED WAIVER & EXPENDITURE AUTHORITIES**

**Comparability; Amount, Duration, Scope of Services**

**1902(a)(10)(B); 1902(a)(17)  
(42 CFR 440.240)  
(42 CFR 440.230)**

To the extent necessary to enable the State to offer different or additional services to some categorically eligible individuals, than to other eligible individuals, based on differing care arrangements for eligible minor ALTCS members in the Parents as Paid Caregivers Program.

To the extent necessary to permit the State to offer coverage through MCOs that provide additional or different benefits to enrollees, than those otherwise available to other eligible individuals.

**Parents as Paid Caregivers**

**1905(a)(24); (42 CFR 440.167)**

To the extent necessary to enable the State to allow parents to perform demonstration caregiver services, including personal care and habilitation services, for eligible minor ALTCS members notwithstanding the requirements of 42 CFR 440.167.



## Comparability; Amount, Duration, Scope of Services

**1902(a)(10)(B); 1902(a)(17)  
(42 CFR 440.240)  
(42 CFR 440.230)**

To the extent necessary to enable the State to offer the family support demonstration service to some categorically eligible individuals, and not to other eligible individuals, based on differing care arrangements for eligible ALTCS members living at home.

To the extent necessary to permit the State to offer coverage through MCOs that provide additional or different benefits to enrollees, than those otherwise available to other eligible individuals.

## Parents as Paid Caregivers

Expenditures for demonstration caregiver services, including habilitation and personal care, provided by parents of eligible minor ALTCS members that are inconsistent with the requirements of 42 CFR 440.167.

## Family Support

Expenditures for the family support demonstration service provided to eligible ALTCS members living at home.

## V. EVALUATION DESIGN

Arizona's 1115 Waiver Evaluation design will be modified to incorporate the AHCCCS Parents as Paid Caregivers demonstration proposal. The table below outlines the proposed hypotheses for this 1115 Waiver amendment and potential performance measures that would allow AHCCCS to effectively test each of the specific hypotheses.

### Parents as Paid Caregivers Objectives, Hypothesis, and Approaches

Objectives	Proposed Hypothesis	Potential Approaches
The AHCCCS Parents as Paid Caregivers demonstration and Extended Family Support Demonstration will increase member satisfaction, ensure delivery of medically appropriate services in the community, and promote positive health and well-being outcomes for the target population.	Both the AHCCCS Parents as Paid Caregivers demonstration and Extended Family Support demonstration will maintain or increase the rate of children in the ALTCS program being served in the home.	Data will be drawn from a variety of sources including, but not limited to: <ul style="list-style-type: none"> <li>• Member surveys,</li> <li>• State eligibility and enrollment data,</li> <li>• Claims/encounter data,</li> <li>• Administrative program data (PMMIS),</li> <li>• T-MSIS, and</li> <li>• National/regional benchmarks.</li> </ul>
	Both the AHCCCS Parents as Paid Caregivers demonstration and Extended Family Support demonstration yield improved member satisfaction with care.	
	The AHCCCS Parents as Paid Caregivers	

	demonstration will mitigate the DCW shortage by increasing timely accessibility to care providers.	
	The AHCCCS Parents as Paid Caregiver demonstration will improve ongoing care stability for the target population.	
	The AHCCCS Parents as Paid caregivers demonstration will yield cost-effective care for AHCCCS members.	
	The AHCCCS Extended Family Support demonstration will increase member and family unit stability through decreased stress and burnout.	

Arizona will develop and submit to CMS a summative evaluation report within 18 months of the end of the current Demonstration period. Included in this summative evaluation report will be a discussion on the impacts resulting from payment to parents of minor children as paid caregivers and extended family support services.

## VI. PUBLIC NOTICE PROCESS

Pursuant to the terms and conditions that govern Arizona's Demonstration, Arizona must provide documentation of its compliance with Demonstration of Public Notice process (42 CFR 431.408), the tribal consultation requirements pursuant to Section 1902(a)(73) of the Act as amended by Section 5006(e) of the American Recovery and Reinvestment Act of 2009, and the tribal consultation requirements outlined in STC 13.

### Public Website

The AHCCCS Parents as Paid Caregivers amendment proposal was posted on the AHCCCS website at <https://www.azahcccs.gov/Resources/Federal/PendingWaivers/ParentCareGivers.html> on June 16, 2023, for public comment. The web page includes a summary of the waiver amendment request, the schedule (dates and times) of public forums across the state, and this draft Waiver amendment proposal. In addition to the website posting, AHCCCS uses social media accounts and electronic mail to notify interested parties about Arizona's Waiver amendment proposal.

### Publication of Public Notice in the Arizona Administrative Register

On July 07, 2023, public notice of the AHCCCS Parents as Paid Caregivers amendment proposal was published in the Arizona Administrative Register. The notice included a summary description of the 1115 Waiver amendment request, the locations, dates and times of the public hearings, instructions on how to submit comments, and a link to where copies of Arizona's Waiver amendment proposal are available for public review and comments. Details of the public notice registry, forums, and communication can be found in **Appendix B**.



### Stakeholder Meetings:

AHCCCS presented the details of Arizona's Parents as Paid Caregivers amendment proposal at two virtual public forum meetings on July 18, 2023 and August 2, 2023 and at Tribal Consultation held on June 22, 2023. In addition, the demonstration proposal was presented at the State Medicaid Advisory Committee (SMAC) meeting on July 12, 2023. Stakeholders were able to submit comments and questions on the proposed 1115 Waiver amendment request during any of the forums, by email to: [waiverpublicinput@azahcccs.gov](mailto:waiverpublicinput@azahcccs.gov), or by mail to: AHCCCS, c/o Division of Community Advocacy and Intergovernmental Relations (DCAIR); 801 E. Jefferson Street, MD 4200, Phoenix, AZ 85034. All comments must have been received by August 21, 2023. More information about the proposed 1115 Waiver amendment, including the proposed 1115 Waiver application and the full public notice and public input process, can be found at <https://www.azahcccs.gov/Resources/Federal/PendingWaivers/ParentCareGivers.html>. Details regarding the public forum meetings can be found in **Appendix C**.

## VII. PUBLIC COMMENT SUMMARY

As part of Arizona's Parents as Paid Caregivers Waiver Amendment, AHCCCS acknowledged, reviewed, and considered all comments received throughout the public input process. In total, AHCCCS directly engaged more than 1,765 stakeholders across the state. AHCCCS received 849 pieces of written and verbal input during the forums and other community events, and obtained 739 pieces of written input through the waiver public input email. These responses were obtained from a variety of stakeholders including, but not limited to, family members, providers, tribal organizations, and consumer advocacy groups. Copies of written comments are included in **Appendix D**. A summary of key themes and additional recommendations obtained throughout the public input process are below. AHCCCS has considered and used all comments received to inform changes to the Parents as Paid Caregivers Proposal to create this present version and presented these changes at a post-public comment community forum held on September 6, 2023 and a Tribal Consultation held on August 29, 2023. AHCCCS will continue to use the community feedback received to inform decisions around operational planning and policy revisions. In addition, AHCCCS will establish a stakeholder engagement process for these planned operational and policy improvements, where stakeholders will have further opportunities to provide input and inform implementation.

AHCCCS recognizes that input during the public comment period is necessary to address waiver concerns to meet beneficiary needs. To be inclusive of all feedback received, AHCCCS categorized written and verbal comments made during public forums, meetings, and that were received through email. AHCCCS reviewed and categorized feedback across key topic areas to better understand the stakeholder concerns. These commonly identified themes are found below along with the agency's response.

### 1. Inclusion of Habilitation

Parents were paid to provide habilitation to their minor children as part of the temporary Appendix K PHE flexibility. The draft Section 1115 PPCG proposal initially limited payments to parents for attendant care services and did not include habilitation. The exclusion of habilitation efforts in the proposal created concern for the public, which included the potential of exacerbated unmet needs, lack of available direct care workers, and members' social decline. Many parents expressed how becoming a habilitation provider afforded their children opportunities to learn new skills or meet new milestones and allowed them to expand their child's social interaction through earned income.

**2. Removal of the 40-hour limit for parent providers**

In the existing Appendix K Parents as Paid Caregivers program, there are no hourly restrictions on the amount of paid care parent providers may provide. Many stakeholders had apprehensions regarding the new implementation of a 40-hour per week per child limit. Further concerns were also expressed regarding the need to find additional direct care workers to provide services beyond the 40-hour limitation.

**3. Start date of the program and potential gaps in care**

In anticipation of the PHE ending on May 11, 2023, AHCCCS obtained an Appendix K amendment to extend the parents as paid caregivers for minor children flexibility through November 11, 2023. Through this submission, AHCCCS is applying to make the Parents as Paid Caregivers program permanent through the State's 1115 Waiver. Stakeholders expressed concerns surrounding gaps in care between November 11 and the proposed October 1, 2024 implementation date. Many stakeholders expressed the desire for a transition period, which will allow them to make incremental changes in preparation for these services. Stakeholders also expressed concerns about finding DCWs and the expiration of this flexibility in November.

**4. Eligible individuals, providers, and other unique circumstances**

Many questions regarding eligibility for the program were brought up by stakeholders, including various eligibility standards for specific familial circumstances such as whether non-traditional parental figures like grandparents or step-parents can provide the services. There were also questions on how the 40-hour per week limitation is applied to unique circumstances such as members living in split-parent households, and what defines a "legally responsible" parent.

**5. Workforce Shortages**

The PPCG program allowed parents to become paid caregivers, which addressed some workforce capacity concerns by allowing parents to assume the responsibilities of a paid DCW. Citing workforce shortage concerns, stakeholders remained concerned about workforce capacity generally, and the difficulty in finding caregivers outside of the family unit to fulfill all of the member's service needs.

**6. Personal experiences with the existing PPCG program**

Throughout the public comment period, stakeholders shared their personal experiences with HCBS services, agencies, and types of providers used. Many times, these personal anecdotes were used to underscore the importance of continuing this flexibility and demonstrating support for its continuance. Additionally, stakeholders provided examples of how the current flexibility had a positive impact on their child's ability to achieve goals when asking for the inclusion of habilitation.

**7. Inconsistencies of service assessment outcomes and understanding of the Appendix K Flexibility**

AHCCCS has four ALTCS Contractors or Managed Care Organizations that are responsible for assessing, coordinating, providing, and managing care for the members, including the Arizona Department of Economic Security, Division of Developmental Disabilities (DDD) who serves the majority of members receiving care under this proposal. Specifically, stakeholders expressed inconsistencies among DDD Support Coordinators in their outreach regarding the Appendix K flexibility, assessment processes and outcomes, and policy interpretations. Additionally under this proposal, parents must be employed or contracted with a direct care service agency to receive payment for services provided. Stakeholders indicated that there are differences in payment methods and benefits across agencies. This expressed concern was largely coupled with the frustration of the inconsistent assessment outcomes that determine the number of authorized services.

**8. Definition of extraordinary care**

The Appendix K authority allows parents to be reimbursed for extraordinary care or “care that exceeds the range of activities that a [parent] would ordinarily perform in the household on behalf of the recipient [member], if he/she did not have a disability or chronic illness, and which are necessary to assure the health and welfare of the enrollee, and avoid institutionalization.” Citing previously held concerns about inconsistent service assessment determinations, stakeholders recommend including a standardized framework and tools to define what constitutes extraordinary care in the context of each individual child.

**9. Support and Inquiries surrounding the additional Family Support Service**

Many stakeholders expressed their support of the proposed family support service to help alleviate existing stressors and maintain the health and well-being of the family unit. Several questions were received from stakeholders surrounding who will be providing, credentialing, and managing the family support service and how it compares to the existing Behavioral Health benefit.

**AHCCCS Response:**

AHCCCS greatly appreciates all feedback received throughout the entirety of the public engagement process including the willingness to share personal examples of the impact of the Appendix K flexibility and the noted public comment themes directly on the member's experience of care. As detailed above, the main themes of the public comments centered around the scope of services, hourly limitation, implementation timeline, and workforce capacity. Stakeholders also expressed concerns and shared experiences about perceived inequalities as it pertained to the outreach and opportunities afforded to members and their families under the current Appendix K flexibility. Lastly, stakeholders endorsed the addition of a new family support service while also inquiring about how the services will be assessed for medical necessity along with the organizations that would serve as providers of the service and the competencies of the individuals providing the services.

In addition to considering public comments for the final proposal, AHCCCS pulled utilization data which showed that of the 3,628 parents providing paid care to their minor children between January and March of 2023, 2,930 (80%) were providing some combination of Habilitation services. The public comment period further reinforced this need as AHCCCS received over 600 individual comments

supporting the addition of Habilitation services to the above proposal. In addition to the agency's decision to include habilitation services in this proposal, AHCCCS also modified the language to clarify that parents will be required to meet competencies for the provision of habilitation services and incorporated additional safeguards to address social isolation such as the requirement that the Person Centered Service Plan incorporate an individualized goal, based upon the member's need and preferences, that affords the member interaction with peers in community settings.

Next, to best determine the potential impact a 40-hour per week limitation would have on the children receiving paid care from their parents, AHCCCS pulled data to show the amount of weekly paid hours parents provided between January and March of 2023.

Number of Paid Hours Provided by Parent Caregiver	Number and Total Percentage of Parent Providers
0-20 Hours	1,758 (51%) Parents
21- 40 Hours	1,419 (41%) Parents
41 - 60 Hours	215 (6%) Parents
61 - 80 Hours	42 (1%) Parents
80 + Hours	20 (0.5%) Parents

Understanding the impact the proposed 40-hour per week limitation would have on the current 277 (8%) parents providing over 40 hours of paid care a week to their child, AHCCCS is proposing to maintain the 40-hour limit, but implement a phase-in implementation of the program to afford an opportunity for members and their families to work in partnership with providers to recruit direct care workers that meet their needs and preferences offering an increased runway to better support the planning and transition to the start of the hourly limitation. As proposed, the phased-in implementation timeline is as follows:

1. From the time of approval until January 31, 2024: There will be no hourly limitations in place.
2. From February 1, 2024, until May 31, 2024: There will be an 80-hour per week limitation.
3. From June 1, 2024, to September 30, 2024: The hourly limitation will drop to 60 hours a week.
4. Beginning October 1, 2024, and thereafter: The 40-hour per week limitation will be in effect.

During the state public comment period, CMS released a State Medicaid Director Letter (SMDL 23-004) which issued guidance to states beginning to take actions to return to normal operations after the end of the flexibilities available during the COVID-19 PHE. Through this guidance, CMS indicated that flexibilities currently approved to end six months after the expiration of the PHE may be extended if the state takes action by November 11, 2023, to incorporate these provisions into underlying HCBS programs. The current flexibility for parents of minor children to get paid for services under the Appendix K authority will remain in effect until the 1115 waiver approval effective date.

AHCCCS will be utilizing data from the EVV system to identify parents who are providing care to their minor children to understand the scope of the program and monitor the per child 40-hour week limitation.

Additionally, AHCCCS is reinforcing a maintenance of effort when it comes to workforce planning to ensure the sustainability of the system to provide home and community based services. Providers will be required to have implementable workforce plans that are reflective of their entire current membership needs irrespective of whether or not members are served by a parent DCW with an emphasis on individually based workforce plans to recruit and retain DCWs to provide respite services and serve as a back up should the parent be unable to provide care or fulfill responsibilities on a temporary basis. Both the agency and individually based workforce plans should consider the member's unique healthcare and acuity needs and preferences.

The public engagement process put a spotlight on the need for additional guidance and clarification of eligibility requirements for the Parents as Paid Caregivers Program. During the implementation of the proposed program, AHCCCS will make necessary policy changes to define "legally responsible parents" and the scope of individuals who can provide paid care under this program. Additionally, AHCCCS will develop criteria to determine when the provision of attendant care and habilitation qualifies as "extraordinary care."

Throughout program implementation, AHCCCS will place a high priority on ensuring equitable access for the permanent authority through the standardization of the education and assessment processes including the processes that support informed discussions regarding the election of the parent as paid caregiver service delivery model, revising current service planning and assessments tools to include measures to define services and tasks that qualify as "extraordinary care." With the understanding of the critical role that case managers/support coordinators play in these processes, AHCCCS plans to develop competencies for case managers/support coordinators relative to the new program, develop training considerate of those competencies, and require supervisors to evaluate the demonstration of those competencies. AHCCCS will also be developing a new scope of service, provider requirements, and competencies for individuals providing the new family support service.

Lastly, in an effort to continue to receive and incorporate the input of stakeholders during the operational phase of program implementation, AHCCCS is committed to a stakeholder engagement plan to ensure stakeholders are informing and advising the agency on critical implementation milestones. To that end, AHCCCS plans to convene an implementation workgroup, representative of the diverse stakeholders impacted by the proposal, to provide input and advise on the operational aspects of the program including the development of communications, revising policy changes/forms, and case manager/support coordinator training.

AHCCCS presented the updated version of the Parents as Paid Caregivers Waiver Amendment Proposal at a post-public comment community forum held on September 6, 2023 and a Tribal Consultation held on August 29, 2023. AHCCCS received positive feedback regarding the updated proposal with minimal recommendations for change.

## VIII. BUDGET NEUTRALITY

This Parents as Paid Caregivers Amendment Proposal is not changing or adding any existing service that will have a material impact on the existing Budget Neutrality Workbook that exists for the State's current 1115 Demonstration number 11-W-00275/9. Due to the authority regarding parents as paid caregivers already existing through a temporary COVID-19 Appendix K flexibility at the time the full budget

neutrality model was created, the State does not anticipate a change within the existing member month rates or capitation rates. Rather, this proposal is requesting a permanent extension of an already existing temporary flexibility through an 1115 Demonstration Waiver.



# **APPENDIX A**

## **Budget Neutrality Report**



Budget Neutrality Summary

Without-Waiver Total Expenditures

	DEMONSTRATION YEARS (DY)					TOTAL
	DY 12 (FFY 2023)	DY 13 (FFY 2024)	DY 14 (FFY 2025)	DY 15 (FFY 2026)	DY 16 (FFY 2027)	
<u>Medicaid per capita</u>						
TANF/SOBRA	\$ 7,958,479,426	\$ 8,523,528,493	\$ 9,128,640,419	\$ 9,776,811,244	\$ 10,471,033,427	\$ 45,858,493,010
SSI	\$ 3,301,545,777	\$ 3,525,860,260	\$ 3,765,416,121	\$ 4,021,252,429	\$ 4,294,460,081	\$ 18,908,534,669
ALTCS-EPD	\$ 2,154,884,870	\$ 2,301,288,780	\$ 2,457,638,179	\$ 2,624,609,659	\$ 2,802,924,320	\$ 12,341,345,807
ALTCS-DD	\$ 2,957,969,176	\$ 3,167,986,605	\$ 3,392,911,501	\$ 3,633,808,217	\$ 3,891,808,601	\$ 17,044,484,100
<u>Medicaid Aggregate</u>						
ARPA HCBS	\$ 602,473,400	\$ 430,391,300				
TOTAL	\$ 16,975,352,650	\$ 17,949,055,437	\$ 18,744,606,220	\$ 20,056,481,550	\$ 21,460,226,429	\$ 95,185,722,285

With-Waiver Total Expenditures

	DEMONSTRATION YEARS (DY)					TOTAL
	DY 12 (FFY 2023)	DY 13 (FFY 2024)	DY 14 (FFY 2025)	DY 15 (FFY 2026)	DY 16 (FFY 2027)	
<u>Medicaid per capita</u>						
TANF/SOBRA	\$ 7,071,751,200	\$ 7,581,058,700	\$ 8,196,640,700	\$ 8,929,092,500	\$ 9,626,811,800	\$ 41,405,354,900
SSI	\$ 2,314,997,400	\$ 2,481,723,500	\$ 2,683,239,500	\$ 2,923,013,700	\$ 3,151,418,000	\$ 13,554,392,100
ALTCS-EPD	\$ 1,838,982,000	\$ 1,971,425,500	\$ 2,131,505,200	\$ 2,321,976,500	\$ 2,503,415,800	\$ 10,767,305,000
ALTCS-DD	\$ 2,661,138,800	\$ 2,852,794,000	\$ 3,084,440,900	\$ 3,360,066,500	\$ 3,622,622,100	\$ 15,581,062,300
<u>Medicaid Aggregate</u>						
ARPA HCBS	\$ 602,473,400	\$ 430,391,300				
<u>Medicaid Aggregate - WW only</u>						
DSHP	\$ 88,178,188	\$ 88,178,188	\$ 88,178,188	\$ 88,178,188	\$ 88,178,188	-
Targeted Investments Program	\$ 26,000,000	\$ 56,000,000	\$ 67,000,000	\$ 56,000,000	\$ 45,000,000	-
TOTAL (not including WW only)	\$ 14,489,342,800	\$ 15,317,393,000	\$ 16,095,826,300	\$ 17,534,149,200	\$ 18,904,267,700	\$ 82,340,979,000

BN ROOM (VARIANCE)	\$ 2,486,009,850	\$ 2,631,662,437	\$ 2,648,779,920	\$ 2,522,332,350	\$ 2,555,958,729	\$ 12,844,743,285
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Demo Extension BN Room	\$ 12,844,743,285
Carryforward savings (DY1 - DY5)	\$ 30,873,085,372
Carryforward savings (DY6 - DY10)	\$ 11,273,775,328
(A) Total Savings	\$ 54,991,603,985
(B) 15% of Projected Medicaid expenditures	\$ 16,419,543,915
Total Available Savings MIN(A,B)	\$ 16,419,543,915
Total CNOM	\$ 690,890,940
TOTAL VARIANCE	\$ 15,728,652,975

CAPPED HYPOTHETICAL ANALYSIS

Without-Waiver Total Expenditures

	DEMONSTRATION YEARS (DY)					TOTAL
	DY 12 (FFY 2023)	DY 13 (FFY 2024)	DY 14 (FFY 2025)	DY 15 (FFY 2026)	DY 16 (FFY 2027)	
HRSN Services	\$ 96,350,000	\$ 96,350,000	\$ 96,350,000	\$ 96,350,000	\$ 96,350,000	\$ 481,750,000
HRSN Infrastructure	\$ 13,500,000	\$ 13,500,000	\$ 13,500,000	\$ 13,500,000	\$ 13,500,000	
TOTAL	\$ 109,850,000	\$ 109,850,000	\$ 109,850,000	\$ 109,850,000	\$ 109,850,000	\$ 549,250,000

With-Waiver Total Expenditures

	DEMONSTRATION YEARS (DY)					TOTAL
	DY 12 (FFY 2023)	DY 13 (FFY 2024)	DY 14 (FFY 2025)	DY 15 (FFY 2026)	DY 16 (FFY 2027)	
HRSN Services	\$ 96,350,000	\$ 96,350,000	\$ 96,350,000	\$ 96,350,000	\$ 96,350,000	\$ 481,750,000
HRSN Infrastructure	\$ 13,500,000	\$ 13,500,000	\$ 13,500,000	\$ 13,500,000	\$ 13,500,000	
TOTAL	\$ 109,850,000	\$ 109,850,000	\$ 109,850,000	\$ 109,850,000	\$ 109,850,000	\$ 549,250,000

HYPOTHETICALS VARIANCE						-
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HYPOTHETICAL ANALYSIS 1

Without-Waiver Total Expenditures

	DEMONSTRATION YEARS (DY)					TOTAL
	DY 12 (FFY 2023)	DY 13 (FFY 2024)	DY 14 (FFY 2025)	DY 15 (FFY 2026)	DY 16 (FFY 2027)	
IHS	\$ 74,200	\$ 97,500	\$ 103,300	\$ 108,900	\$ 114,800	\$ 498,700
TOTAL	\$ 74,200	\$ 97,500	\$ 103,300	\$ 108,900	\$ 114,800	\$ 498,700

With-Waiver Total Expenditures

	DEMONSTRATION YEARS (DY)					TOTAL
	DY 12 (FFY 2023)	DY 13 (FFY 2024)	DY 14 (FFY 2025)	DY 15 (FFY 2026)	DY 16 (FFY 2027)	
IHS	\$ 74,200	\$ 97,500	\$ 103,300	\$ 108,900	\$ 114,800	\$ 498,700
TOTAL	\$ 74,200	\$ 97,500	\$ 103,300	\$ 108,900	\$ 114,800	\$ 498,700

HYPOTHETICALS VARIANCE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
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HYPOTHETICAL ANALYSIS 2

Without-Waiver Total Expenditures

	DEMONSTRATION YEARS (DY)					TOTAL
	DY 12 (FFY 2023)	DY 13 (FFY 2024)	DY 14 (FFY 2025)	DY 15 (FFY 2026)	DY 16 (FFY 2027)	
Newly Eligible Adults + Expansion State Adults	\$ 5,815,194,652	\$ 6,257,758,232	\$ 6,733,965,215	\$ 7,246,395,639	\$ 7,797,869,338	\$ 33,851,183,076
TOTAL	\$ 5,815,194,652	\$ 6,257,758,232	\$ 6,733,965,215	\$ 7,246,395,639	\$ 7,797,869,338	\$ 33,851,183,076

With-Waiver Total Expenditures

	DEMONSTRATION YEARS (DY)					TOTAL
	DY 12 (FFY 2023)	DY 13 (FFY 2024)	DY 14 (FFY 2025)	DY 15 (FFY 2026)	DY 16 (FFY 2027)	
Newly Eligible Adults + Expansion State Adults	\$ 5,815,194,652	\$ 6,257,758,232	\$ 6,733,965,215	\$ 7,246,395,639	\$ 7,797,869,338	\$ 33,851,183,076
TOTAL	\$ 5,815,194,652	\$ 6,257,758,232	\$ 6,733,965,215	\$ 7,246,395,639	\$ 7,797,869,338	\$ 33,851,183,076

HYPOTHETICALS VARIANCE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
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## **APPENDIX B**

# **Waiver Amendment Public Notice**



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**NOTICES OF PUBLIC INFORMATION**


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Agencies use Notices of Public Information to notify stakeholders about other information that pertains to rulemaking notices under A.R.S. § 41-1013(B)(14). When required by law, agencies also use this notice to notify the public about information not related to rulemaking.

The most common use for this notice is to correct errors printed in a rulemaking notice or extend a public comment period.

The Administrative Rules Division of the Office does not provide a standard template for Notices of Public Information because the content of this type of notice varies.

An agency shall follow the Office's formatting standards when preparing this type of notice and use a numbered list of questions and answers. Additionally, an agency receipt shall be filed with a Notice of Public Information.

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**NOTICE OF PUBLIC INFORMATION**
**ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM (AHCCCS)  
ADMINISTRATION**
**1115 RESEARCH AND DEMONSTRATION WAIVER AMENDMENT REQUEST:  
PARENTS AS PAID CAREGIVERS**

[M23-25]

- 1. Name of the Agency:** Arizona Health Care Cost Containment System Administration (AHCCCS)
- 2. The public information:** AHCCCS 1115 Research and Demonstration Waiver Amendment Request

**I. Summary**

The Arizona Health Care Cost Containment System (AHCCCS) is requesting an amendment to the State's current Demonstration project, "Arizona Medicaid Section 1115 Demonstration" under section 1115 of the Social Security Act (Project Number 11-W-00275/9). In response to the COVID-19 Public Health Emergency (PHE), AHCCCS submitted and received approval for an Appendix K waiver amendment to allow for certain flexibilities to their program, including payments to parents who serve as paid caregivers for minor children. The goal of this proposal is to better address the direct care worker (DCW) shortage by permanently extending payments to parents who serve as paid caregivers for minor children while also further developing the Arizona Long Term Care System (ALTCS) to include extended family supports to preserve a supportive home environment and mitigate access to care challenges.

Since 1982, AHCCCS has been delivering high-quality, cost-effective health care services to Arizonans via a managed care delivery system authorized through an 1115 waiver. In 1988, AHCCCS' original 1115 Demonstration was substantially amended to allow Arizona to implement ALTCS for individuals who are elderly and/or have physical disabilities and individuals with intellectual/developmental disabilities. Since that time, the ALTCS program has evolved by creating an array of home and community based settings and services to support members to live in the least restrictive setting while still receiving the appropriate care. The program has continued to grow to over 66,000 members in July of 2022 with approximately 89 percent of members receiving HCBS. The ALTCS program includes a flexible service delivery model whereby spouses and family members (including parents of adult children) can provide paid authorized services within the member's own home. Prior to COVID-19, parents of minor children had never been paid for care they provided to their minor child.

The COVID-19 Public Health Emergency (PHE) necessitated new innovations and service delivery models to ensure members continued to receive services if the family decided not to allow DCWs into their homes or if DCWs decided not to continue working in the home setting to mitigate the risk of exposure. As a result, AHCCCS submitted and received approval for a temporary Appendix K PHE flexibility to allow for parents to be reimbursed for the provision of the "extraordinary care" that was required of them throughout the course of the pandemic. The agency received an extension of this flexibility for six months after the end of the PHE on March 22, 2023 extending the program until November 11, 2023 under the same Appendix K authority. As defined in AHCCCS' 1115 Waiver, "extraordinary care," is defined as "care that exceeds the range of activities that a [parent] would ordinarily perform in the household on behalf of the recipient [member], if he/she did not have a disability or chronic illness, and which are necessary to assure the health and welfare of the enrollee, and avoid institutionalization." The State is seeking to ensure the continuation of allowing for parents to be reimbursed for the provision of this "extraordinary care" direct care services to their minor children past the current expiration date of November 11, 2023 through a section 1115 Demonstration amendment. Per the AHCCCS Medical Policy Manual, Chapter 1240-A, the scope of direct care services include attendant care, personal care or homemaker services.

Under this Demonstration proposal, the agency will seek to:

- Mitigate DCW shortage and other access to care challenges by allowing payments to parents who serve as paid caregivers for their minor children,
- Increase member satisfaction and promote positive health and well-being outcomes for the target population,
- Extend an additional support service to restore, enhance, and maintain family functioning to preserve effective care for the member in the home and community, and
- Ensure that members receive high-quality care while increasing timely accessibility to care providers.

## II. **Proposed Eligibility Requirements under the Demonstration**

### **Background**

On March 13, 2020, the President of the United States declared the 2019 novel coronavirus (COVID-19) a nationwide emergency pursuant to Section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5207 (the “Stafford” Act). The President’s declaration provided authority for the Secretary of the U.S. Department of Health and Human Services to enhance States’ ability to respond to the COVID-19 outbreak, including the power to temporarily waive or modify Medicaid and CHIP requirements under Section 1135 of the Social Security Act. Temporary flexibilities were granted through policy changes or various legal authorities.

To minimize disruption in care for AHCCCS members requiring home and community-based services (HCBS) during the course of the PHE, Arizona requested and received approval via an Appendix K amendment which allowed parents of minor children to receive payment for personal care services. Most recently, Arizona obtained an extension of this Appendix K amendment currently set to expire six months after the end of the public health emergency on November 11, 2023. Upon careful review of this authority with Agency staff and external stakeholders, AHCCCS has determined the need to make payments to parents of minor caregivers an on-going flexibility within the State’s Section 1115 Research and Demonstration Waiver.

### **Addressing Arizona’s Workforce Shortage Through Temporary Flexibilities**

Prior to the PHE, Arizona experienced overall workforce shortages in the state. These shortages were further exacerbated by the PHE and are particularly pronounced for DCWs delivering services in HCBS settings.<sup>1</sup> Further complicating matters, there is a nationwide shortage of in-home caregivers due to rising demand for services related to the aging population<sup>2</sup>. In Arizona, this translates to potentially 41,000 new and available jobs for direct-care workers over the next seven years to help meet demand.<sup>3</sup> A workforce survey of DCWs conducted by the Paraprofessional Healthcare Institute (PHI) in 2021 estimated that Arizona providers will need to fill nearly 130,000 job openings from 2016.<sup>4</sup>

As the PHE continued, the DCW workforce challenges were exacerbated and the system became more reliant on parents providing authorized paid care, while parents became increasingly accustomed to the care being delivered in this way. As a result, when ARP Section 9817 funding became available AHCCCS decided to continue this PPCG flexibility through September 30, 2024 using the Section 9817 funds to provide an additional runway for parents, case managers, and the provider agencies representing the DCW workforce to prepare for this flexibility to end and make plans for this transition to mitigate any potential access to care risks. Outside of extending PPCG, AHCCCS prioritized use of the ARP funding to develop a multi-pronged approach to address recruitment and retention of DCWs to bolster the workforce to assume the provision of care after the conclusion of the flexibility. These strategies were informed by the HCBS stakeholder community as well as the 2021 PHI survey findings suggesting opportunities to support paid caregivers through additional compensation, training, supervision, and opportunities for advancement and support. The multi-pronged approach includes the following activities:

- Time limited directed provider payments to support recruitment and retention efforts,
- Develop new or additional trainings, including specialized trainings as a way to promote workforce retention,
- Support the career pathway of a DCW by promoting transparency on how to begin a career as a DCW and provide administrative resources to encourage recruitment,
- Promote investments in the development of new tools and technologies, such as a workforce database that helps the agency monitor workforces across the state, including DCWs, and
- Expand existing processes and technologies in the state, such as home-grown training programs.

### **Seeking Payment to Parents as Paid Caregivers Permanently**

Addressing workforce shortages needs to focus simultaneously on filling the current gaps as well as preparing for future membership growth to mitigate compounded shortages in the future. In recognition of these challenges, the Agency proposed numerous interventions and investments described above aimed at attracting and retaining the DCW workforce through its Section 9817 ARPA Spending Plan, including payments to parents of minor children. However, over the course of implementing the aforementioned initiatives, based on stakeholder feedback and available data it became apparent to the State that the PPCG program continues to be a critical lifeline for the complex children and families that AHCCCS serves. The anticipated workforce needs and projected increase in our ALTCS population, combined with the anticipated number of DCWs entering the workforce, creates a

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1. Watts, M., Musumeci, M., Ammula, M. 2021. *State Medicaid Home & Community-Based Services (HCBS) Programs Respond to COVID-19: Early Findings from a 50-State Survey*. Kaiser Family Foundation. <https://www.kff.org/report-section/state-medicare-home-community-based-services-hcbs-programs-respond-to-covid-19-early-findings-from-a-50-state-survey-issue-brief/>

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2. MACPAC. 2022, March. *State Efforts to Address Medicaid Home-and Community-Based Services Workforce Shortages*. [https://www.azahcccs.gov/shared/Downloads/News/2022/220322\\_MACPAC-brief-on-HCBS-workforce.pdf](https://www.azahcccs.gov/shared/Downloads/News/2022/220322_MACPAC-brief-on-HCBS-workforce.pdf)

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3. Duarte, C., 2019, February 10. *Shortage of Home-Care Workers in US, Arizona called a ‘Growing Crisis’*. Arizona Daily Star. [https://tucson.com/news/local/shortage-of-home-care-workers-in-us-arizona-called-a/article\\_f3acc21a-f915-593d-b0fa-d207080a3680.html](https://tucson.com/news/local/shortage-of-home-care-workers-in-us-arizona-called-a/article_f3acc21a-f915-593d-b0fa-d207080a3680.html)

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4. Campbell, Stephen. Insights From the Frontline: Results of a Statewide Survey of Paid Caregivers in Arizona. Paraprofessional Healthcare Institute (PHI), 2021.

scenario where augmenting the DCW workforce in Arizona through his PPCG program is essential to ensuring members are able to receive the care they need.

Under this proposal, parents who do provide these services must meet all direct care worker requirements as established by AHCCCS policy including being employed/contracted by an AHCCCS Registered Direct Care Service Agency, passing specific direct care worker competency tests, and demonstrating compliance with Electronic Visit Verification (EVV) per the 21<sup>st</sup> Century Cures Act (Cures Act). The services and number of authorized hours will be assessed and determined through the Person-Centered Service Planning (PCSP) process including a determination of what services/hours will be provided by informal (uncompensated) supports. The provision of informal supports must be voluntary on the part of the caregiver. In accordance with AHCCCS Medical Policy Manual (AMPM) Section 1620, case managers will review with a member/family members/Health Care Decision Makers (and other members of the service planning team) various service delivery models and utilize a decision tree to make an informed decision regarding the model that will best meet the member's needs, including decisions about the individuals who will serve as caregivers such as DCWs recruited by the agency and/or member/family, non-parental family members, and/or parents as a last resort when other options have been exhausted and when the parent is willing and able to provide the paid care.

Consistent with AHCCCS' ALTCS guiding principles, the person centered planning process should maximize member-direction and support the member to make an informed decision and lead/participate in the process to the fullest extent possible. Case managers will document any selection of a member-directed service model option in the PCSP, including the option for parents of minor children to provide paid care. Parents who provide these services must also maintain quarterly in-person case management visits as well as agency supervisory visits as further detailed in AMPM 1240-A. Parents would be limited to 40 hours of paid care, per child, in a given week where paid care by a parent caregiver cannot exceed more than 16 hours in a single day. If two children are receiving direct care services (attendant care, personal care or homemaker services), the parent(s) may provide up to a combined 80 hours of paid care per week (40 hours for each child). The exact number of hours (up to 40 per child) approved for payment will be determined through the person-centered planning process and must meet medical necessity requirements. Although these hourly limitations are in place, members can still receive more than 40 hours of authorized paid care in a given week through the use of an alternate caregiver.

#### **Extend Family Support/Home Care Maintenance:**

As an auxiliary support to the PPCG proposal detailed above, the Agency is proposing to establish a home care training family support (family support) service as part of the HCBS benefit package detailed in "Attachment L" of the State's approved STC document (Project Number 11-W-00275/9) for the long-term care population on the basis of the institutional level of care criteria (age or disability) that qualifies them for long term services and supports. Family support is directed toward restoration, enhancement, or maintenance of the family functioning to increase the family's ability to effectively interact and care for the member in the home and community. This service provides critical supports to members and their caregivers for the purpose of learning about, navigating, and planning for implementation of their Person-Centered Service Plans (PCSP) and help to address the needs of the family member(s), who are providing compensated and uncompensated care, including challenges they face when coping with the member's health care condition(s) and related stress and isolation that accompanies continuous and daily care of the member. Currently, a comparable service is available to AHCCCS members with a behavioral health need under the rehabilitation benefit in the agency's State Plan. By extending this benefit to the long-term care population and expanding beyond just those with a behavioral health need, AHCCCS will be better positioned to preserve the supportive environment and sustain the likelihood of members remaining in their home, thereby mitigating access to care challenges and risks of the member's utilization of higher levels of care in order to have their needs met.

AHCCCS is seeking authority to provide family support to primary caregivers (providing compensated and uncompensated care) of children and adults enrolled in the Arizona Long Term Care System (ALTCS) program. The service will be provided by family members who have lived experience in supporting a family member enrolled in the ALTCS program and demonstrate competencies required to provide the service. Family support may involve activities such as assisting the family to learn skills related to adjustment to the member's disability or aging process or significant life events or transitions, enhancing and improving the health and wellbeing of the member and family unit, navigating the health care system, self-advocacy, development of natural supports and community support systems, participating in the PCSP development, and implementation of individual and family goals and long-term life planning.

Family support would be limited to ALTCS members who are residing at home and will not supplant case management services. Primary family caregivers are eligible for the service and that includes families created through birth, foster care, adoption, marriage, or a self-created family unit. The service will be authorized by the case manager with limits on the amount, frequency and/or duration specified in PCSP and based on assessed needs. The PCSP will include a specific assessment of the family members' physical and mental wellbeing and outline targeted goals for both the family member and the member specific to the family support service. Family support may be provided individually or in a group setting. Additionally, more than one provider agency may bill for family support provided to a member at the same time if indicated by the member's assessed needs as identified through their PCSP.

### **III. Waiver Amendment Proposal Details**

#### **A. Proposed Cost Sharing Requirements under the Demonstration as Amended:**

This Demonstration does not change the Medicaid benefit package design; there is no new cost-sharing, copayments, or coinsurance for any benefit provided under the waiver. State Plan benefits will continue to be applied in accordance with the State Plan and all eligibility groups will continue to receive all State Plan benefits.

#### **B. Proposed Changes to the Delivery System under the Demonstration as Amended:**

The delivery system for persons impacted by this proposed 1115 Waiver amendment will not vary from AHCCCS' current program features as described in the current State Plan and Demonstration.

**C. Proposed Changes to Benefit Coverage under the Demonstration as Amended:**

Through the Extended Family Support and Home Care Maintenance Demonstration, AHCCCS is seeking to add an additional benefit to the existing HCBS benefit package detailed in “Attachment L” of the State’s approved STC document (Project Number 11-W-00275/9). The proposed service provides critical support to members and their caregivers to assist with the education, navigation, and implementation of their PCSPs to address the needs of the family members serving with the goal of restoring, enhancing, and maintaining family functioning.

**D. Proposed Changes to Eligibility Requirements.**

The Demonstration does not change the Medicaid benefit package design; there are no new eligibility requirements outside of those established as an eligible minor within ALTCS enrolled within Arizona’s 1115 Demonstration Project.

**IV. Waiver and Expenditure Authorities Necessary to Authorize the Demonstration****Comparability; Amount, Duration, Scope of Services**

**1902(a)(10)(B); 1902(a)(17); (42 CFR 440.240); (42 CFR 440.230)**

To the extent necessary to enable the State to offer different or additional services to some categorically eligible individuals, than to other eligible individuals, based on differing care arrangements for eligible minor ALTCS members in the Parents as Paid Caregivers Program.

To the extent necessary to permit the State to offer coverage through MCOs that provide additional or different benefits to enrollees, than those otherwise available to other eligible individuals.

**Parents as Paid Caregivers 1905(a)(24); (42 CFR 440.167)**

To the extent necessary to enable the State to allow parents to perform demonstration caregiver services, including personal care, for eligible minor ALTCS members notwithstanding the requirements of 42 CFR 440.167.

**Comparability; Amount, Duration, Scope of Services**

**1902(a)(10)(B); 1902(a)(17); (42 CFR 440.240); (42 CFR 440.230)**

To the extent necessary to enable the State to offer the family support demonstration service to some categorically eligible individuals, and not to other eligible individuals, based on differing care arrangements for eligible ALTCS members living at home.

To the extent necessary to permit the State to offer coverage through MCOs that provide additional or different benefits to enrollees, than those otherwise available to other eligible individuals.

**Parents as Paid Caregivers**

Expenditures for demonstration caregiver services, including personal care, provided by parents of eligible minor ALTCS members that are inconsistent with the requirements of 42 CFR 440.167.

**Family Support**

Expenditures for demonstration caregiver services, including personal care, provided by parents of eligible minor ALTCS members that are inconsistent with the requirements of 42 CFR 440.167.

**V. Evaluation Design**

Arizona’s 1115 Waiver Evaluation design will be modified to incorporate the AHCCCS Parents as Paid Caregivers demonstration proposal. The table below outlines the proposed hypotheses for this 1115 Waiver amendment and potential performance measures that would allow AHCCCS to effectively test each of the specific hypotheses.

**Parents as Paid Caregivers Objectives, Hypothesis, and Approaches** *(starts at the top of the next page)*

Objectives	Proposed Hypotheses	Potential Approaches
The AHCCCS Parents as Paid Caregivers demonstration and Extended Family Support Demonstration will increase member satisfaction, ensure delivery of medically appropriate services in the community, and promote positive health and wellbeing outcomes for the target population.	Both the AHCCCS Parents as Paid Caregivers demonstration and Extended Family Support demonstration will maintain or increase the rate of children in the ALTCS program being served in the home.	Data will be drawn from a variety of sources including, but not limited to: • Member surveys, • State eligibility and enrollment data, • Claims/encounter data, • Administrative program data (PMMIS), • T-MSIS, and • National/regional benchmarks.
	Both the AHCCCS Parents as Paid Caregivers demonstration and Extended Family Support demonstration yield improved member satisfaction with care.	
	The AHCCCS Parents as Paid Caregivers demonstration will mitigate the DCW shortage by increasing timely accessibility to care providers.	
	The AHCCCS Parents as Paid Caregiver demonstration will improve ongoing care stability for the target population.	
	The AHCCCS Parents as Paid caregivers demonstration will yield cost-effective care for AHCCCS members.	
	The AHCCCS Extended Family Support demonstration will increase member and family unit stability through decreased stress and burnout.	

Arizona will develop and submit to CMS a summative evaluation report within 18 months of the end of the current Demonstration period. Included in this summative evaluation report will be a discussion on the impacts resulting from payment to parents of minor children as paid caregivers and extended family support services.

#### **VI. Public Notice Process**

Pursuant to the terms and conditions that govern Arizona's Demonstration, Arizona must provide documentation of its compliance with Demonstration of Public Notice process (42 CFR 431.408), the tribal consultation requirements pursuant to Section 1902(a)(73) of the Act as amended by Section 5006(e) of the American Recovery and Reinvestment Act of 2009, and the tribal consultation requirements outlined in STC 13.

#### **Public Website**

The AHCCCS Parents as Paid Caregivers amendment proposal was posted on the AHCCCS website at <https://www.azahcccs.gov/Resources/Federal/PendingWaivers/ParentCareGivers.html> on June 16, 2023, for public comment. The web page includes a summary of the waiver amendment request, the schedule (dates and times) of public forums across the state, and this draft Waiver amendment proposal. In addition to the website posting, AHCCCS is using social media accounts and electronic mail to notify interested parties about Arizona's Waiver amendment proposal.

#### **Publication of Public Notice in the Arizona Administrative Register**

This issue of the *Register* includes public notice of the AHCCCS Parents as Paid Caregivers amendment proposal. The notice includes a summary description of the 1115 Waiver amendment request, the locations, dates and times of the public hearings, instructions on how to submit comments, and a link to where copies of Arizona's Waiver amendment proposal are available for public review and comments.

#### **Stakeholder Meetings**

AHCCCS will present the details about AHCCCS' Parents as Paid Caregivers amendment proposal at two virtual public forum meetings on July 18, 2023 and August 2, 2023 and will conduct a virtual Tribal Consultation meeting on August 2, 2023. In addition, AHCCCS' Parents as Paid Caregivers demonstration proposal will be presented at the State Medicaid Advisory Committee (SMAC) meeting on July 12, 2023. Details regarding the public forum meetings, including TC and SMAC, can be found on the following pages.

Public Forum Meeting	Meeting Dates & Times	Meeting Web Link & Call-in Information
Public Forum #1	July 18, 2023, 2 p.m. - 4 p.m. AZ Time	<p>Register in advance for this webinar: <a href="https://ahcccs.zoom.us/webinar/register/WN_atyB5uwUSKSj6jtfcsN-Ow">https://ahcccs.zoom.us/webinar/register/WN_atyB5uwUSKSj6jtfcsN-Ow</a> Webinar Passcode: AHCCCS23!</p> <p>Or join by phone: Dial (for higher quality, dial a number based on your current location): US: +1 669 444 9171 or +1 669 900 6833 or +1 408 638 0968 or +1 253 215 8782 or +1 346 248 7799 or +1 719 359 4580 or +1 253 205 0468 or +1 305 224 1968 or +1 309 205 3325 or +1 312 626 6799 or +1 360 209 5623 or +1 386 347 5053 or +1 507 473 4847 or +1 564 217 2000 or +1 646 876 9923 or +1 646 931 3860 or +1 689 278 1000 or +1 301 715 8592 or 833 548 0282 (Toll Free) or 877 853 5257 (Toll Free) or 888 475 4499 (Toll Free) or 833 548 0276 (Toll Free) Webinar ID: 828 3761 3099 Passcode: 578556317</p>
Public Forum #2	August 2, 2023, 1 p.m. - 3 p.m. AZ Time	<p>Register in advance for this webinar: <a href="https://ahcccs.zoom.us/webinar/register/WN_283HKrFEQ0aBaaum0ys34Q">https://ahcccs.zoom.us/webinar/register/WN_283HKrFEQ0aBaaum0ys34Q</a> Webinar Passcode: AHCCCS23!</p> <p>Or join by phone: Dial (for higher quality, dial a number based on your current location): US: +1 408 638 0968 or +1 669 444 9171 or +1 669 900 6833 or +1 253 205 0468 or +1 253 215 8782 or +1 346 248 7799 or +1 719 359 4580 or +1 689 278 1000 or +1 301 715 8592 or +1 305 224 1968 or +1 309 205 3325 or +1 312 626 6799 or +1 360 209 5623 or +1 386 347 5053 or +1 507 473 4847 or +1 564 217 2000 or +1 646 876 9923 or +1 646 931 3860 or 833 548 0276 (Toll Free) or 833 548 0282 (Toll Free) or 877 853 5257 (Toll Free) or 888 475 4499 (Toll Free) Webinar ID: 884 8665 8184 Passcode: 770241598</p>
Tribal Consultation	August 10, 2023, 1 p.m. - 5 p.m. AZ Time	<p>Register in advance for this Webinar: <a href="https://ahcccs.zoom.us/webinar/register/WN_y5wi6_mFR5uwABAHfERmVg">https://ahcccs.zoom.us/webinar/register/WN_y5wi6_mFR5uwABAHfERmVg</a></p>

State Medicaid Advisory Committee (SMAC)	July 12, 2023, 1 p.m. - 3 p.m. AZ Time	Please click this URL to join: <a href="https://ahcccs.zoom.us/j/89593915466?pwd=NHMzaTZScG9xMTBibzBPaUUyOC9odz09">https://ahcccs.zoom.us/j/89593915466?pwd=NHMzaTZScG9xMTBibzBPaUUyOC9odz09</a> Passcode: SMAC2023! Join by Audio Only: 877 853 5257 (Toll Free) or 888 475 4499 (Toll Free) or 833 548 0276 (Toll Free) or 833 548 0282 (Toll Free) Webinar ID: 895 9391 5466 Passcode: 777510703
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#### **VII. Budget Neutrality**

This Parents as Paid Caregivers Amendment Proposal is not changing or adding any existing service that will have a material impact on the existing Budget Neutrality Workbook that exists for the State's current 1115 Demonstration number 11-W-00275/9. Due to the authority regarding parents as paid caregivers already existing through a temporary COVID-19 Appendix K flexibility at the time the full budget neutrality model was created, the State does not anticipate a change within the existing member month rates or capitation rates. Rather, this proposal is requesting a permanent extension of an already existing temporary flexibility through an 1115 Demonstration Waiver.



## Parents as Paid Caregivers Waiver Amendment Forums

### TOPIC:

Parents as Paid Caregivers Benefit Extension

### WHAT YOU'LL LEARN:

In a proposal to the Centers for Medicare and Medicaid Services (CMS), AHCCCS is requesting the authority to permanently extend the Parents as Paid Caregivers Program that is currently allowable through a temporary COVID-19 flexibility. AHCCCS is also requesting to add extended family supports to preserve a supportive home environment and mitigate access to care challenges for the Arizona Long Term Care System (ALTCS) population.

Those who would like to provide their input on this proposal are encouraged to attend.



## Forum Registration and Webinar Details

PUBLIC FORUMS	
Dates	Zoom Links
<b>Public Forum #1</b> <b>July 18, 2023</b> 2:00 p.m.-4:00 p.m. AZ Time	<a href="#">Register in advance for this webinar.</a>
<b>Public Forum #2</b> <b>August 2, 2023</b> 1:00 p.m.-3:00 p.m. AZ Time	<a href="#">Register in advance for this webinar.</a>
<b>Tribal Consultation</b> <b>June 22, 2023</b> 1:00 p.m.-5:00 p.m. AZ Time	<a href="#">Register in advance for this webinar.</a>

American Sign Language (ASL) interpretation and Communication Access Realtime Translation (CART) captioning services are available upon request. If you require these or other types of accommodations pursuant to the Americans with Disabilities Act (ADA), please contact Austin Hernandez at [austin.hernandez@azahcccs.gov](mailto:austin.hernandez@azahcccs.gov).

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### **AHCCCS Opens Public Comment Period Regarding Caregiver Benefits for Parents**

The Arizona Health Care Cost Containment System (AHCCCS) opened a public comment period through August 21, 2023 to solicit input on the request for federal approval to extend Medicaid reimbursement to parents who provide caregiver services to their minor children.

To gather feedback on this proposal, AHCCCS will hold two virtual public forums, 2:00 p.m., July 18, 2023 and 1:00 p.m., August 2, 2023. See [the forum flier](#) and register in advance for either forum using the link on the Parents as Paid Caregivers web page. Public comments may also be submitted by email to [waiverpublicinput@azahcccs.gov](mailto:waiverpublicinput@azahcccs.gov) or by mail to the address on the Parents as Paid Caregivers web page.

[Read more](#)



### **AHCCCS Earns Healthy Arizona Worksite Platinum Award for Fifth Consecutive Year**

AHCCCS received the Healthy Arizona Worksite Platinum Award for the fifth consecutive year for demonstrating efforts to positively affect the health of its employees.

The Platinum level award is given to organizations that properly identify health challenges among their employees and actively work to overcome them.

"We are honored to receive this award for a fifth time, which is a testament to the value AHCCCS places on employee work/life balance and well-being," said Carmen Heredia, AHCCCS director. "With a majority remote workforce, maintaining that focus in a virtual environment is even more challenging. We have shifted the focus from in-office events to supporting a healthy workplace, whether in office or remote, for all employees."

[Read more](#)**AHCCCS Changes Enrollment Procedures for the American Indian Health Program**

AHCCCS will no longer accept requests for enrollment into the American Indian Health Program (AIHP) over the phone. This is a change to the enrollment procedures for individuals selecting AIHP as their assigned Medicaid health plan, and is an additional measure to prevent fraudulent enrollment.

The American Indian Health Program Change Request Form on the [American Indian Health Program web page](#) now reflects this change, and all new enrollment requests must be submitted in writing to AHCCCS by fax or email by an Indian Health Service (IHS), Tribally owned/and or operated 638 facility, or Urban Indian Health Organization on behalf of a member.

[Read more](#)**Changes to AHCCCS Provider Enrollment and Billing System Close Ability for Fraudulent Behavioral Health Claims Payments**

In response to the discovery of significant fraudulent Medicaid behavioral health billing in Arizona, AHCCCS has made numerous system changes to stop deceptive providers who bill for services that are or were not provided, not appropriate, or not necessary.

Some of the holistic, system-wide improvements to the Medicaid payment system include:

- Added ability to flag concerning claims,
- Ended ability for providers to bill on behalf of others, and
- Imposed prepayment review for various scenarios including multiple providers billing the same client on the same day for similar services, excessive number of hours per day, and the age of patients.

A few of the changes to the AHCCCS provider enrollment process include:

- Moved three behavioral health provider types to the high risk category which requires a Fingerprint Clearance Background Check and site visit, and
- Received federal approval for a 6-month moratorium on all new provider enrollments for Behavioral Health Outpatient Clinics, Integrated Clinics, Non-Emergency Transportation providers, Behavioral Health Residential Facilities, and Community Service Agencies providers.
- 

[Read the press release](#) and see the accompanying [Provider Payment Suspension Fact Sheet](#).

**AHCCCS Director Tours The Centers for Habilitation**

Director Heredia had the chance to tour the Centers for Habilitation last month to learn more about their day and employment services for individuals with developmental or physical disabilities. She also met with providers of services for people with disabilities to learn more about their essential work in Arizona.



## AHCCCS Encourages Members to Respond to Renewal Requests

AHCCCS encourages members to complete their annual renewal even if they do not believe they will meet Medicaid eligibility criteria. This is important for two reasons:

1. Individuals may qualify for *other* Medicaid program categories. For example, children may still qualify for KidsCare, even if a parent does not qualify for Medicaid, and
2. Members who no longer meet financial Medicaid eligibility may be automatically referred to the Healthcare Marketplace at [www.healthcare.gov](http://www.healthcare.gov), but *only* if their renewal has been completed. AHCCCS cannot refer members who do not complete their renewal.

Members can find their renewal date once they login to [www.healtharizonaplus.gov](http://www.healtharizonaplus.gov) by clicking on "My Medical Assistance."

[Read more about the renewal process](#)



## Make a Well-Care Visit Part of Your Child's Back-to-School Plan

*AHCCCS members ages 3-19 who complete their first well-care visit this summer can receive a \$25 gift card*

As you check off the list of your child's back-to-school items, AHCCCS encourages parents to schedule a well-care visit for health screenings and routine vaccines. AHCCCS or KidsCare members, ages 3-19, and who complete their first well-care visit of 2023 between June 5 and Sept. 5 are

eligible to receive a \$25 gift card from their health plan.

"Well-care visits are a vital tool to screen for health conditions and preventable diseases," said Dr. Sara Salek, chief medical officer at AHCCCS. "We want to help children get a healthy start this school year."

[Read more](#)

## AHCCCS Community Forum

Mon., July 17, 10:00 a.m.—noon, online on Zoom.

[Register in advance.](#)

Topics for this month's forum include Parents as Paid Caregivers, Member Exploitation and Behavioral Health Fraud Response from AHCCCS, Solari SMI/SED Eligibility Determination Process, Office of Human Rights (OHR) Training Overview, and more.



### **Parents as Paid Caregivers Waiver Public Forum #1**

Tues., July 18, 2:00 p.m.—4:00 p.m., online on Zoom

[Register in advance.](#)

In a proposal to the Centers for Medicare and Medicaid Services (CMS), AHCCCS is requesting the authority to permanently extend the Parents as Paid Caregivers Program that is currently allowable through a temporary COVID-19 flexibility. AHCCCS is also requesting to add extended family supports to preserve a supportive home environment and mitigate access to care challenges for the Arizona Long Term Care System (ALTCS) population. Those who would like to provide their input on this proposal are encouraged to attend.

### **Office of Human Rights Training: Covered Behavioral Health Services**

Wed., July 19, 10:00 a.m.—11:30 a.m., online on Zoom.

[Register in advance.](#)

This training will discuss covered behavioral health services specifically for those individuals with a Serious Mental Illness (SMI) designation.

### **Jacob's Law Training**

Thurs., July 20, 10:00 a.m.—noon, online on Zoom.

[Register in advance.](#)

This training will cover Jacob's Law, the DCS placement packet, legal rights and protections of children and resource parents, and covered services.

### **OIFA Health Care Navigation: Funding and Oversight**

Tues., July 25, noon—12:30 p.m., online on Zoom.

[Register in advance.](#)

Join us to learn about Behavioral Support Services and how they can support members with a behavioral health condition.

### **Parents as Paid Caregivers Waiver Public Forum #2**

Wed., Aug. 2, 1:00 p.m.—3:00 p.m., online on Zoom

[Register in advance.](#)

See the [AHCCCS Calendar](#) for events in August.





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### **National Data on Medicaid Renewals Demonstrates Arizona's Success**

The Centers for Medicare and Medicaid Services (CMS) released [national reporting of the Medicaid renewal progress by state](#), based on reporting by each state for the months of March and April. Arizona was one of five states that began the renewal and disenrollment process as of April 1, 2023.

The CMS data is a snapshot of Arizona's first month of renewals and does not reflect the current reality; the current [Arizona Renewals dashboard](#) is more illustrative of where the state stands today. Since April, AHCCCS has used its renewal data to learn in real time from the experience of members and how to better serve them through the renewal process.

[Read more](#)

### **Address Change Chatbot Helps AHCCCS Members Update Their Contact Information to Prepare for Renewal**

AHCCCS launched a new feature that makes it easy for members to update their contact information. Sam, the chatbot on the Medicaid eligibility website [www.healthearizonaplus.gov](http://www.healthearizonaplus.gov) (HEAplus), can now process address changes directly in chat, in English and Spanish, with no need for the member to log into their HEAplus account.

Since launching at the end of June, more than 2,000 AHCCCS members have successfully updated their contact information in the chatbot in less than 3 minutes, on average.

[Read more about the HEAplus chatbot](#)

## Nearly 70% of Medicaid Beneficiaries Renewed in June Kept AHCCCS Coverage

On July 10, AHCCCS released its monthly Medicaid renewal data dashboard detailing progress since the regular renewal process began on April 1, 2023.

In the month of June, 67% of the renewals initiated were automatically determined to be eligible to maintain AHCCCS coverage. The automatic, also called ex parte, process requires no response from the member and no action from a State employee. Approximately 25% of all individuals who have been disenrolled for not responding to AHCCCS have taken advantage of the 90-day window to finish their renewal.

[Read more](#)

## AHCCCS Holds Forum for Public Comment on Caregiver Benefits for Parents

AHCCCS has opened a public comment period through August 21, 2023, to solicit input on the request for federal approval to extend Medicaid reimbursement to parents who provide caregiver services to their minor children.

To gather feedback on this proposal, AHCCCS will hold a virtual public forum at 1:00 p.m., August 2. See the [forum flier](#) and [register in advance](#).

Public comments may also be submitted by email to [waiverpublicinput@azahcccs.gov](mailto:waiverpublicinput@azahcccs.gov) or by mail to the address on the [Parents as Paid Caregivers web page](#).

[Read more](#)



## AHCCCS Director Presents at The Hertel Report State of the State Meeting

AHCCCS director Carmen Heredia presented data and updates at The Hertel Report's summer State of the State meeting in July. The annual meeting brings health care leaders from around the state together to discuss health care system issues that impact all Arizonans. In this year's meeting, Director Heredia discussed the agency's progress with the return to the regular renewals and its most recent monthly renewal dashboard. Attendees also heard other speakers' updates about Arizona's health care marketplace, Medicare, Accountable Care Organizations, rising health care costs, and Arizona's uninsured rate.

Follow [AHCCCS on social media](#) or the latest news and events!

## Hear Christine Holden, AHCCCS Tribal Liaison, on Native Talk Radio

Christine Holden, AHCCCS tribal liaison, was interviewed on Native Talk Radio this week about her role at the agency, how Native American members can engage with AHCCCS, and what they need to know about the Medicaid renewal process.



Hear the podcast on [Apple podcasts](#), [Spotify](#), [Google podcast](#), or find it on the [Native Talk Arizona web page](#).

### Parents as Paid Caregivers Waiver Public Forum #2

Wed., Aug. 2, 1:00 p.m.—3:00 p.m., online on Zoom  
[Register in advance](#).

### Jacob's Law Training

Thurs., August 17, 10:00 a.m.— noon, online on Zoom  
[Register in advance](#).

This training will cover Jacob's Law, the DCS placement packet, legal rights and protections of children and resource parents, and covered services.



### OIFA Health Care Navigation

Tues., August 22, noon—12:30 p.m., online on Zoom  
[Register in advance](#).

Join us to learn about Behavioral Support Services and how they can support members with a behavioral health condition.

### Office of Human Rights Training: Court-Ordered Evaluation & Treatment for Individuals Living with a Serious Mental Illness

Thurs., August 24, 10:00—11 a.m., online on Zoom  
[Register in advance](#).

This training will cover what behavioral health services are covered, specifically for those with a Serious Mental Illness (SMI) designation.

See the [AHCCCS calendar](#) for more scheduled events.





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Friday, June 30, 2023

**Good morning,**

Here's the latest from the AHCCCS Office of Individual and Family Affairs (OIFA).



**AHCCCS Opens Public Comment Period Regarding...**

AHCCCS Opens Public Comment Period Regarding Caregiver Benefits for Parents

[Read more](#)

[myemail.constantcontact.com](https://myemail.constantcontact.com)



## Community Forums

### Upcoming Initiatives

The Arizona Health Care Cost Containment System (AHCCCS) is hosting an online community forum to inform the community and gather feedback on upcoming AHCCCS initiatives.

**Topics:** Parents as Paid Caregivers, Member Exploitation and Behavioral Health Fraud Response from AHCCCS, Solari SMI/SED Eligibility Determination Process, Office of Human Rights (OHR) Training Overview, and more!



We look forward to hearing from AHCCCS members, family members, advocates, community members, providers, and stakeholders at this month's community forum.

### Forum Registration and Webinar Details

<p><b>Monday, July 17, 2023</b> 10:00 a.m. – 12:00 p.m.</p>	<p><a href="#">Register in advance for this webinar.</a></p> <p>After registering, you will receive a confirmation email containing information about joining the webinar.</p>
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### AHCCCS Earns Healthy Arizona Worksite Platinum...

AHCCCS Earns Healthy Arizona Worksite Platinum Award for Fifth Consecutive Year

[Read more](#)  
[myemail.constantcontact.com](mailto:myemail.constantcontact.com)



## Health Care Navigation: Using OIFA Empowerment Tools to Navigate the Health Care System

*AHCCCS OIFA invites you to attend a virtual event to learn about tools that can help you take control of your health care.*

**Topic: Behavioral Support Services**  
**When: July 25, 2023, Noon – 12:30 p.m.**  
**Where: Online through Zoom**

Join us to learn about Behavioral Support Services and how they can support members with a behavioral health condition.

All AHCCCS members, family members, and stakeholders are welcome to attend.

[Register in advance for this event](#)

After registering, you will receive a confirmation email containing information about how to join the meeting.



To learn more about OIFA and see a list of all Empowerment Tools, visit [ahcccs.gov/oifa](https://ahcccs.gov/oifa).



### AHCCCS Changes Enrollment Procedures for the...

AHCCCS Changes Enrollment Procedures for the American Indian Health Program

[Read more](#)  
[myemail.constantcontact.com](mailto:myemail.constantcontact.com)



## Jacob's Law Training

Arizona House Bill 2442 was passed into law in 2016, and became known as Jacob's Law. It helped to correct many issues facing foster, kinship, and adopted children who receive behavioral health services.

This training covers the following:

- Overview of Jacob's Law,
- Review and Use of the DCS Placement Packet,
- Legal Rights & Protections for Children and Resource Parents, and
- Covered Services.

Training length is two (2) hours. Certificates available upon request.

**Thursday, July 20, 2023**  
10:00 a.m. –12:00 p.m.

[Register in advance for this webinar.](#)

After registering, you will receive a confirmation email containing information about joining the webinar.



## Waiver Amendment Forum

### Parents as Paid Caregivers Waiver Amendment Forums

#### TOPIC:

Parents as Paid Caregivers Benefit Extension

#### WHAT YOU'LL LEARN:

In a proposal to the Centers for Medicare and Medicaid Services (CMS), AHCCCS is requesting the authority to permanently extend the Parents as Paid Caregivers Program that is currently allowable through a temporary COVID-19 flexibility. AHCCCS is also requesting to add extended family supports to preserve a supportive home environment and mitigate access to care challenges for the Arizona Long Term Care System (ALTCs) population. Those who would like to provide their input on this proposal are encouraged to attend.



### Forum Registration and Webinar Details

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Dates	Zoom Links
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<b>Public Forum #2</b> <b>August 2, 2023</b> 1:00 p.m.-3:00 p.m. AZ Time	<a href="#">Register in advance for this webinar.</a>
<b>Tribal Consultation</b> <b>August 10, 2023</b> 1:00 p.m.-5:00 p.m. AZ Time	<a href="#">Register in advance for this webinar.</a>







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## AHCCCS

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## ▼ Healthcare Advocacy

[Committees & Workgroups \(/AHCCCS/CommitteesAndWorkgroups/\)](#)[Transparency \(/AHCCCS/Transparency/\)](#)

## Community Presentations

The Arizona Health Care Cost Containment System (AHCCCS) is hosting community forums across the state to inform the community **and** gather feedback on the upcoming AHCCCS initiative on RBHA services. We look forward to hearing from members, family members, advocates, community members, providers and stakeholders at one of the planned community forums listed below.

The Arizona Health Care Cost Containment System (AHCCCS) is hosting online forums to inform the community and gather feedback on the upcoming AHCCCS initiatives.

*ASL interpretation and CART captioning services are available upon request. If you require these or other types of accommodations pursuant to the Americans with Disabilities Act (ADA), please contact the AHCCCS Public Information Officer at [heidi.capriotti@azahcccs.gov](mailto:heidi.capriotti@azahcccs.gov) (mailto:heidi.capriotti@azahcccs.gov?Subject=Community Presentations Requests) or 602-417-4729 at least seven business days prior to any meeting you wish to attend.*

Date/Time	Meeting Name	Location	Details
Wednesday, September 6, 2023 at 1:00 p.m.—2:00 p.m.	AHCCCS Public Forum: Review of Final Parents as Paid Caregivers Waiver Amendment Proposal	Webinar	<p>At this community forum, AHCCCS will present the changes to the Parents as Paid Caregivers 1115 An a result of the public comment received, before it's submitted to the federal government for approval</p> <p>Presentation (/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/ParentPaidCaregivers_PostPublicFlier (/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/ParentsasPaidCaregivers1115WaiverAmendmentProposal</p>
Monday, September 18, 2023 at 11:00 a.m.—11:30 a.m.	AHCCCS Hot Topics	Webinar	<p>To help members, family members, stakeholders, advocates, and community members interact with AHCCCS regularly presents short meetings on “hot topics.”</p> <p>Join us to learn more about Arizona’s comprehensive 1115 Waiver including its history, current initiatives, and future plans.</p> <p>This Month’s Topic: Overview and Upcoming Initiatives of the AHCCCS 1115 Demonstration Waiver</p> <p>Presentation (/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/AHCCCSHotTopics_Presentation (/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/AHCCCSHotTopics20230918</p> <p>Register in advance for this event <a href="#">🔗</a></p>
Thursday, September 21, 2023 at 10:00 a.m.—noon	Jacob’s Law Training	Webinar	<p>Arizona House Bill 2442 was passed into law in 2016, and became known as Jacob’s Law. It helped to protect foster, kinship, and adopted children who receive behavioral health services.</p> <p>This training covers the following:</p> <ul style="list-style-type: none"> <li>• Overview of Jacob’s Law,</li> <li>• Review and Use of the DCS Placement Packet,</li> <li>• Legal Rights &amp; Protections for Children and Resource Parents, and</li> <li>• Covered Services.</li> </ul> <p>Training length is two (2) hours. Certificates available upon request.</p> <p>Flier (/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/JacobsLawTraining20230921</p> <p>Register in advance for this event <a href="#">🔗</a></p>
Tuesday, September 26, 2023 at 10:30 a.m.—11:50 a.m.	Office of Human Rights (OHR) Training Session: Inpatient Treatment and Discharge Planning for Individuals Living with Serious Mental Illness	Webinar	<p>The AHCCCS Office of Human Rights (OHR) will hold an online training session “Inpatient Treatment and Discharge Planning for Individuals Living with Serious Mental Illness”</p> <p>This training will cover:</p> <ol style="list-style-type: none"> <li>1. Division of Community Advocacy and Intergovernmental Relations (DCAIR) overview,</li> <li>2. Office of Human Rights (OHR) overview,</li> <li>3. Inpatient Treatment and Discharge Planning for Individuals Living with Serious Mental Illness,</li> <li>4. Office of Individual and Family Affairs (OIFA) overview,</li> <li>5. Advocacy resources, and</li> <li>6. Upcoming AHCCCS forums and training.</li> </ol> <p>Register in advance for this event <a href="#">🔗</a></p>

Date/Time	Meeting Name	Location	Details
Tuesday, September 26, 2023 at noon—12:30 p.m.	OIFA Health Care Navigation	Webinar	<p>This month's topic: Justice System Reach-In (Care Coordination) for Arizonans Leaving Jails or Prisons</p> <p>Join us to learn about Justice System Reach-In for Arizonans Leaving Jails or Prisons. Learn about the ( upon release that can help connect individuals to medical care, transportation, employment services, necessary services.</p> <p>All AHCCCS members, family members, and stakeholders are welcome to attend.</p> <p>Flier (/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/September2023SystemNavi</p> <p>Register in advance for this event <a href="#">🔗</a></p>

## Community Presentations Archive

Previous Presentations ▼

### January 2023

- Former Foster Youth Annual Automatic Renewal Waiver Amendment (1/23/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/FormerFosterYouthWaiverAmendmentPresentation01230223.pdf)
- OIFA Health Care Navigation (1/24/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/OIFA\_HealthCareNavigation1\_24\_23.pdf)
- Housing and Health Opportunities (H2O) Waiver Forum (1/31/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/H2O\_CommunityForum1\_31\_23.pdf)

### February 2023

- AHCCCS Hot Topics (2/13/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/AHCCCS\_HotTopics\_20230213.pdf)
- Former Foster Youth Annual Automatic Renewal Waiver Amendment (2/22/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/FormerFosterYouthWaiverAmendmentPresentation02222023.pdf)
- OIFA Health Care Navigation (2/28/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/SystemNavigation02282023.pdf)

### March 2023

- AHCCCS Hot Topics (3/20/23) (/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/AHCCCSHotTopics\_20230320.pdf)
- OIFA Health Care Navigation (3/28/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/SystemNavigation03282023.pdf)

### April 2023

- AHCCCS Community Forum (4/17/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/AHCCCSCommunityForum\_20230417.pdf)
- OIFA Health Care Navigation (4/25/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/SystemNavigation04252023.pdf)

### May 2023

- AHCCCS Hot Topics (5/15/23) (/AHCCCS/Downloads/PublicNotices/CommunityPresentations/AHCCCSHotTopics\_20230515.pdf)

### June 2023

- AHCCCS Hot Topics (6/19/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/HotTopics\_Presentation\_20230619.pdf)
- OIFA Health Care Navigation (6/27/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/SystemNavigation06272023.pdf)



## July 2023

- AHCCCS Community Forum (7/17/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/AHCCCSCommunityForum\_20230717.pdf)
- Parents as Paid Caregivers 1115 Waiver Amendment Community Forum (7/18/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/ParentPaidCaregivers\_Presentation.pdf)
- Parents as Paid Caregivers 1115 Waiver Amendment Community Forum (7/18/23) (Spanish)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/ParentPaidCaregivers\_SpanishPresentation.pdf)
- OIFA Health Care Navigation (7/25/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/SystemNavigation\_072023.pdf)

## August 2023

- Parents as Paid Caregivers 1115 Waiver Amendment Community Forum (8/2/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/ParentPaidCaregivers\_Presentation.pdf)
- Parents as Paid Caregivers 1115 Waiver Amendment Community Forum (8/2/23) (Spanish)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/ParentPaidCaregivers\_SpanishPresentation.pdf)
- OIFA Health Care Navigation (8/22/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/08222023SystemNavigation.pdf)
- AHCCCS Hot Topics Presentation (8/21/23)  
(/AHCCCS/Downloads/PublicNotices/CommunityPresentations/2023/AHCCCSHotTopics\_20230821.pdf)

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Arizona Health Care Cost Containment System

Published by Hootsuite · July 10 ·

We need your input! Join us on July 18 at 2 p.m. to learn more about the Parents as Paid Caregivers Waiver proposal and give us your feedback. Register in advance: <https://ow.ly/QvL450P6L5j>



## Parents Paid as Caregivers Community Forum

July 18, 2023  
2:00 - 4:00 p.m.  
Online



Arizona Health Care Cost Containment System

Published by Hootsuite · July 14 ·

Next Tuesday (7/18)! Join us for a community forum about our Parents as Paid Caregivers Waiver proposal and give us your feedback. Register now: <https://ow.ly/O91a50P6L6n>



## Parents Paid as Caregivers Community Forum

July 18, 2023  
2:00 - 4:00 p.m.  
Online



Arizona Health Care Cost Containment System

Published by Hootsuite · July 18 ·

Today (7/18) at 2 p.m.! Join our community forum and give us your feedback on our Parents as Paid Caregivers Waiver proposal. Register now! <https://ow.ly/GjAq50P6LbI>



## Parents Paid as Caregivers Community Forum

July 18, 2023  
2:00 - 4:00 p.m.  
Online



Arizona Health Care Cost Containment System

Published by Hootsuite · July 21 ·


Did you miss our first Parents as Paid Caregivers forum? No need to worry, we are having another one on Aug. 2 at 1 p.m. Register now: <https://ow.ly/Cu6650P6LM8>




## Parents Paid as Caregivers Community Forum

August 2  
1:00 - 3:00 p.m.  
Online





**Arizona Health Care Cost Containment System**  
Published by Hootsuite · July 27 ·


Next week! Give us your input on our Parents as Paid Caregivers Waiver proposal by joining our forum on Aug. 2 at 1 p.m. Register in advance: <https://ow.ly/QSgy50P6LNT>




## Parents Paid as Caregivers Community Forum

**August 2**  
**1:00 - 3:00 p.m.**  
**Online**





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Published by Hootsuite · August 2 ·

TODAY (8/2) at 1 PM! Join our community forum and give us your feedback about our Parents as Paid Caregivers Waiver proposal. Register now! <https://ow.ly/IH250P6LP6>



## Parents Paid as Caregivers Community Forum

**August 2**  
**1:00 - 3:00 p.m.**  
**Online**



## INSTAGRAM



## Parents Paid as Caregivers Community Forum

**July 18, 2023**  
**2:00 - 4:00 p.m.**  
**Online**




**ahcccsgov**


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#healthcare #health #AHCCCS  
#publichealth #healthinsurance  
#medicaid #arizona

10w


**ankita.sidana** Promote it on @arizona\_diaries

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**8 likes**  
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July 18, 2023  
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July 18, 2023  
2:00 - 4:00 p.m.  
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your feedback on our Parents as Paid  
Caregivers Waiver proposal. Register  
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#publichealth #healthinsurance  
#medicaid #arizona

9w



his.mouthpiece A man near 1110 W  
Washington St said he's going to die  
because since I'm SMI the Human  
Services Campus interfered with me  
charging my phone (they do this all  
the time and kill it all the time too). I  
have enough to write this message. I



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**Online**



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#medicaid #arizona

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#publichealth #healthinsurance  
#medicaid #arizona

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## Parents Paid as Caregivers Community Forum

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**Online**



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ahcccsgov TODAY (8/2) at 1 PM!  
Join our community forum and give us  
your feedback about our Parents as  
Paid Caregivers Waiver proposal.  
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8 likes  
AUGUST 2



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## X (Formerly known as Twitter)



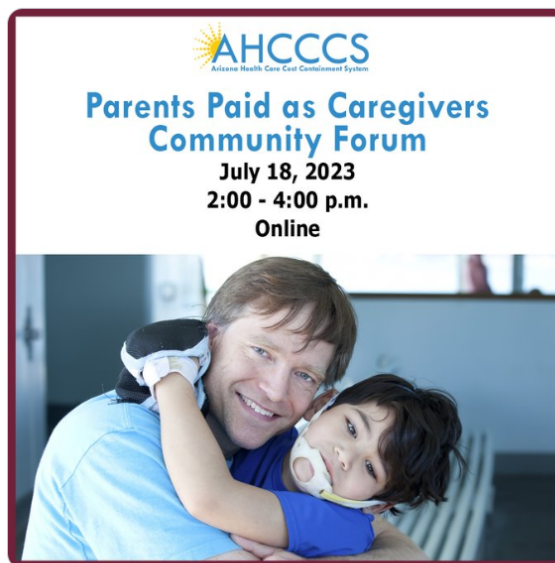
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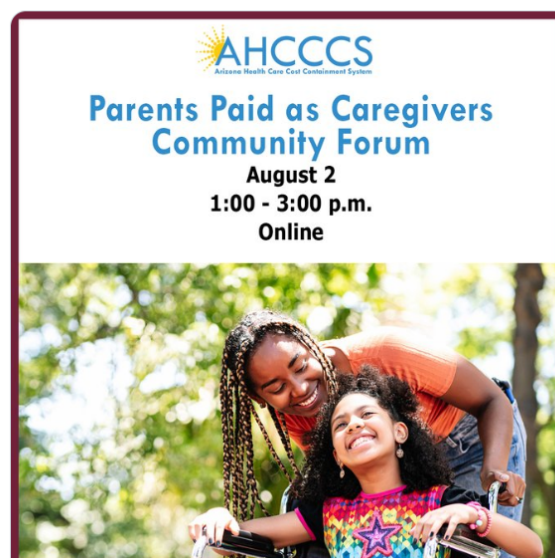
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Did you miss our first Parents as Paid Caregivers forum? No need to worry, we are having another one on Aug. 2 at 1 p.m. Register now: [ow.ly/CiZZ50P6LM5](https://ow.ly/CiZZ50P6LM5)





AHCCCS  
@AHCCCSgov

...

Next week! Give us your input on our Parents as Paid Caregivers Waiver proposal by joining our forum on Aug. 2 at 1 p.m. Register in advance: [ow.ly/AH4r50P6LNU](https://ow.ly/AH4r50P6LNU)



## Parents Paid as Caregivers Community Forum

**August 2**  
**1:00 - 3:00 p.m.**  
**Online**



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## Parents Paid as Caregivers Community Forum

**August 2**  
**1:00 - 3:00 p.m.**  
**Online**





# LINKEDIN



Arizona Health Care Cost Containment System (AHCCCS)  
7,537 followers  
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We need your input! Join us on July 18 at 2 p.m. to learn more about the Parents as Paid Caregivers Waiver proposal and give us your feedback. Register in advance: <https://ow.ly/Hpy050P6L5k>



## Parents Paid as Caregivers Community Forum

July 18, 2023  
2:00 - 4:00 p.m.  
Online



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Next Tuesday (7/18)! Join us for a community forum about our Parents as Paid Caregivers Waiver proposal and give us your feedback. Register now: <https://ow.ly/QM8950P6L6o>



## Parents Paid as Caregivers Community Forum

July 18, 2023  
2:00 - 4:00 p.m.  
Online



Arizona Health Care Cost Containment System (AHCCCS)  
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Today (7/18) at 2 p.m.! Join our community forum and give us your feedback on our Parents as Paid Caregivers Waiver proposal. Register now! <https://ow.ly/OsvP50P6LbK>



## Parents Paid as Caregivers Community Forum

July 18, 2023  
2:00 - 4:00 p.m.  
Online



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Did you miss our first Parents as Paid Caregivers forum? No need to worry, we are having another one on Aug. 2 at 1 p.m. Register now: <https://ow.ly/oltb50P6LM7>



## Parents Paid as Caregivers Community Forum

August 2  
1:00 - 3:00 p.m.  
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Kate Pochinski-Lemke, MBA, PMP and 15 others

3 reposts



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Next week! Give us your input on our Parents as Paid Caregivers Waiver proposal by joining our forum on Aug. 2 at 1 p.m. Register in advance:  
<https://ow.ly/wOJE50P6LNS>



## Parents Paid as Caregivers Community Forum

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TODAY (8/2) at 1 PM! Join our community forum and give us your feedback about our Parents as Paid Caregivers Waiver proposal. Register now!  
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## Parents Paid as Caregivers Community Forum

**August 2**  
**1:00 - 3:00 p.m.**  
**Online**





# **APPENDIX C**

## **Waiver Amendment Public Forum Meeting Agenda and Slides**





# Parents as Paid Caregivers Waiver Amendment

Shreya Arakere, Federal Waiver and Evaluation Administrator  
Division of Community Advocacy and Intergovernmental Relations

# Introduction & Welcoming Remarks

# Section 1115 of the Social Security Act

- Allows states flexibility to design Demonstration projects that promote the objectives of the Medicaid program,
- Demonstration projects are typically approved for a five-year period and can be renewed every five years, and
- Must be budget neutral, meaning that federal spending under the waiver cannot exceed what it would have been in absence of the waiver,
- Must undergo extension evaluations with an independent evaluator.

# 1115 Waiver Renewal Approval


- On Oct.14, 2022 CMS approved Arizona's request for a five-year extension of its 1115 Waiver
  - October 14, 2022 through Sept. 30, 2027
- Continues:
  - Retroactive Eligibility
  - HCBS
  - Managed Care
    - ACC
    - ALTCS
    - CHP
    - ACC-RBHA



# Parents as Paid Caregivers Waiver Amendment

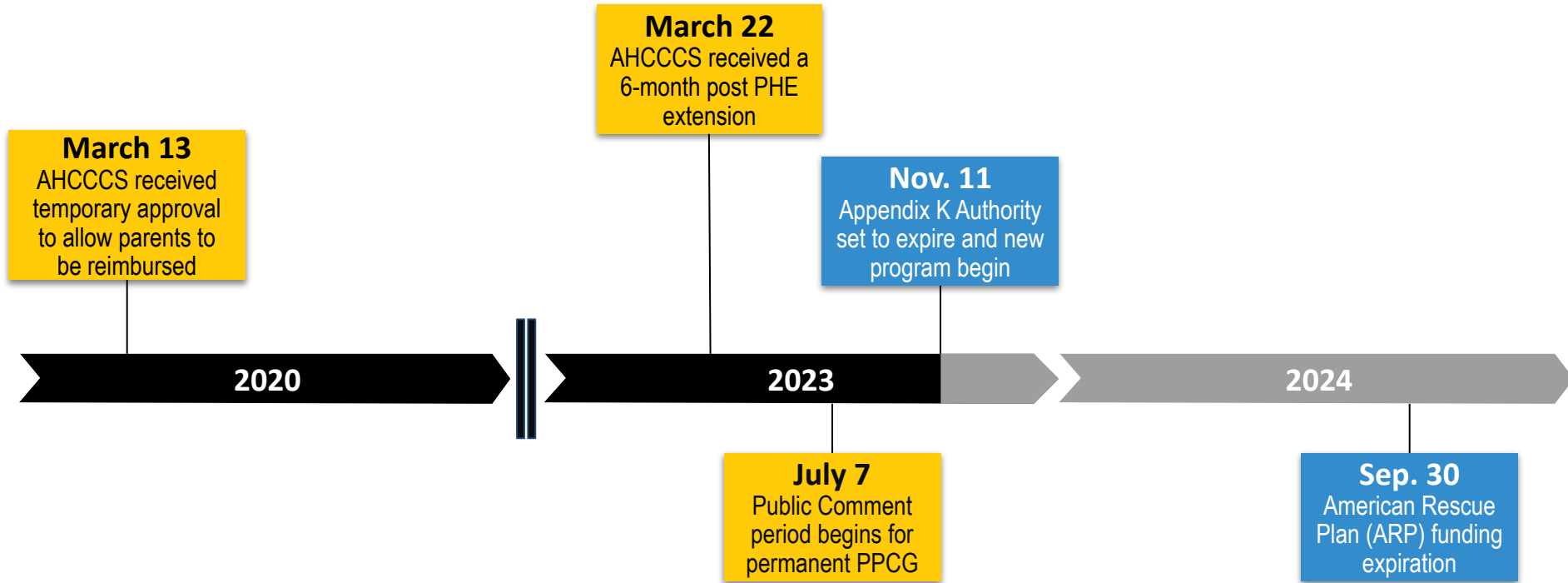


# Parents as Paid Caregivers Overview



Pre-PHE (1988-2020)	During-PHE (2020-2023)	After-PHE (2023- →)
<p>No ability for parents to be paid as caregivers for their minor children</p> <p>Ability for parents of adult children (and other family members) to provide care has been a long standing feature of the ALTCS program</p>	<p>Parents as Paid Caregivers of their Minor Children- Temporary flexibility offered by CMS to address challenges presented by PHE. Includes:</p> <ul style="list-style-type: none"><li>- Paying parents for services such as attendant care and habilitation</li><li>- No hourly limitations</li></ul> <p>Parents of adult children (and other family members) remained in place</p>	<p>Proposal looks to continue aspects of the program including:</p> <ul style="list-style-type: none"><li>- Paying parents for attendant care</li><li>- 40 hour limitation for parents</li><li>- Inclusion of family support services for ALTCS members and families</li></ul> <p>Parents of adult children (and other family members) will remain in place</p>

# Parents as Paid Caregivers - Timelines



# Parents as Paid Caregivers

- **Eligible Individuals:** Eligible minor Arizona Long-Term Care (ALTCS) members who require home and community-based services (HCBS).
- **Benefits:**
  - Allows legally responsible parents to receive payment for “extraordinary” direct care services (attendant care, personal care, and homemaker services) approved under the 1115 demonstration waiver, and
  - Parents would be limited to 40 hours of paid care, per child, in a given week and cannot exceed more than 16 hours in a single day.

# Parents as Paid Caregivers

- Parents who do provide these services must meet all direct care worker requirements as established by AHCCCS policy including:
  - Being employed/contracted by an AHCCCS Registered Direct Care Service Agency,
  - Passing specific direct care worker competency tests, and
  - Demonstrating compliance with Electronic Visit Verification (EVV) per the 21st Century Cures Act.
- Parents who provide these services must also maintain quarterly in-person case management visits as well as agency supervisory visits.

# Extended Family Support & Home Care Maintenance

- As an auxiliary support to the PPCG proposal, the Agency is proposing to establish a home care training family support (family support) service for the long-term care population.
- Currently, a comparable service is available to AHCCCS members with a behavioral health need under the rehabilitation benefit in the agency's State Plan.

# Extended Family Support & Home Care Maintenance

- **Eligible Individuals:** Primary caregivers of children and adults enrolled in the Arizona Long Term Care System who are residing at home.
- **Benefits:** Family supports may involve activities such as:
  - Assisting the family to learn skills related to adjustment to the member's disability or aging process or significant life events or transitions,
  - Enhancing and improving the health and wellbeing of the member and family unit,
  - Navigating the healthcare system,
  - Self-advocacy, and more.

# Parents as Paid Caregivers - Goals

- Mitigate DCW shortage and other access to care challenges by allowing payments to parents who serve as paid caregivers for their minor children,
- Increase member satisfaction and promote positive health and well-being outcomes for the target population,
- Extend an additional support service to restore, enhance, and maintain family functioning to preserve effective care for the member in the home and community, and
- Ensure that members receive high-quality care while increasing timely accessibility to care providers.

# Parents as Paid Caregivers - Future Steps

- Upon CMS approval, the following operational and system modifications will be implemented:
  - Policy Revisions
  - MCO network development for the family support service
  - Case Manager Training
  - Member and family member education and outreach



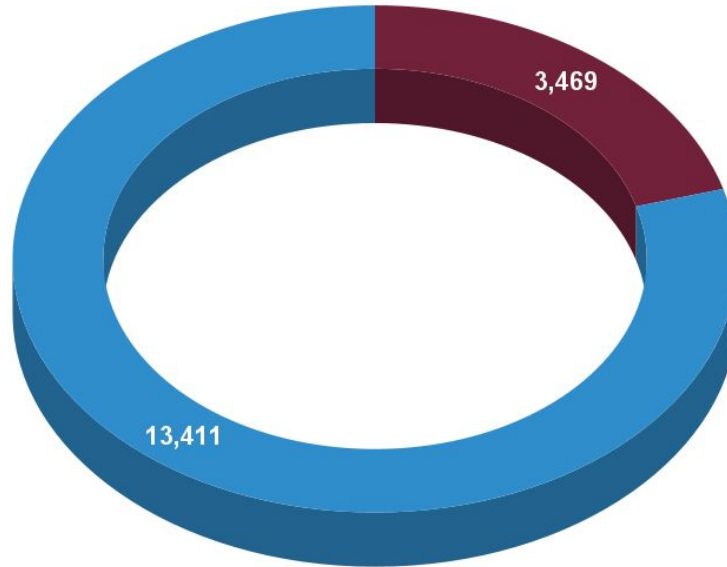
# Data Snapshot

# Data Caveats

- Based on EVV data from January - March 2023 for attendant care and habilitation services
- Reflects members under the age of 18 at the time of service
- Currently, there is no identifier to indicate if the person delivering the service is a parent
- Involved manual process to produce the data
- Does not include EPD data
  - AHCCCS is currently working with the EPD MCOs to obtain data for EPD members
  - As of July 2023, there are 417 members under the age of 18 in the EPD program
- Does not include respite, IDLA habilitation (daily), group home, or day program workforces.

# Number of Minor Children Served by Parent

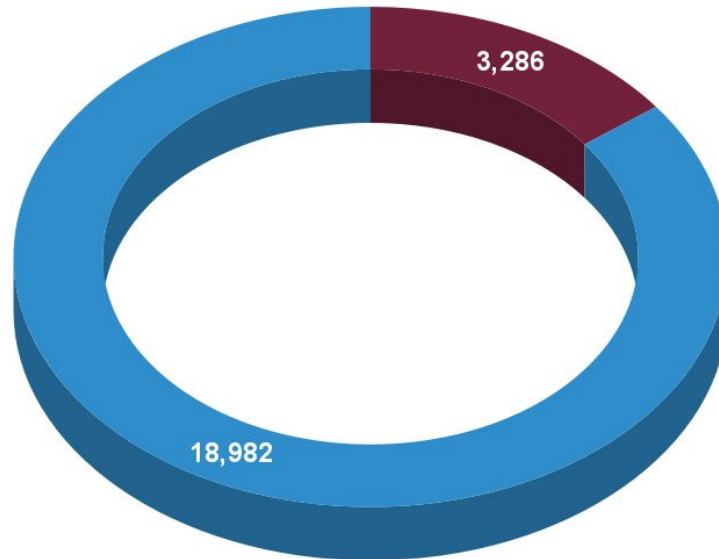
● Minor children served by parent    ● Minor children living at home receiving HCBS



# of minor children served by parent	3,469
#of minor children living at home receiving HCBS	16,880

# Direct Service Provider Comparison

● Parents as Paid Caregiver    ● Other Direct Service Providers



Total # of <b>parent</b> DCWs	3,286
Total # of <b>other</b> DCWs	18,982
Total # of DCWs	22,268

# Resources

# Parents as Paid Caregivers Resources

- More information on the Parents as Paid Caregivers Waiver Amendment can be found at [www.azahcccs.gov/Resources/Federal/PendingWaivers/ParentCareGivers.html](http://www.azahcccs.gov/Resources/Federal/PendingWaivers/ParentCareGivers.html).
- The web page includes a summary of Arizona's Demonstration amendment request & the schedule (dates and times) of public forums across the state.

# Public Comments

Public comments or written testimony may be submitted to AHCCCS via:

[waiverpublicinput@azahcccs.gov](mailto:waiverpublicinput@azahcccs.gov)

AHCCCS, c/o Division of Community Advocacy and  
Intergovernmental Relations,  
801 E. Jefferson Street, MD 4200  
Phoenix, AZ 85034

Comments are received through 08/21/2023



# Quality of Care Resources

- More information on the AHCCCS Quality Strategy can be found here: [www.azahcccs.gov/PlansProviders/HealthPlans/strategy.html](http://www.azahcccs.gov/PlansProviders/HealthPlans/strategy.html).
- Information on the ongoing monitoring related to Home and Community Based Services can be found here: [www.azahcccs.gov/HCBS](http://www.azahcccs.gov/HCBS)
- DDD Office of Individual and Family Affairs (OIFA): <https://des.az.gov/services/disabilities/developmental-disabilities/individuals-and-families/oifa>



## Parents as Paid Caregivers

## Waiver Amendment - Post Public Comment Period

Shreya Arakere, Federal Waiver and Evaluation Administrator  
Division of Community Advocacy and Intergovernmental Relations

# Section 1115 of the Social Security Act

- Allows states flexibility to design Demonstration projects that promote the objectives of the Medicaid program,
- Demonstration projects are typically approved for a five-year period and can be renewed every five years,
- Must be budget neutral, meaning that federal spending under the waiver cannot exceed what it would have been in absence of the waiver, and
- Must undergo extension evaluations with an independent evaluator.

# Parents as Paid Caregivers Waiver Amendment


# Parents as Paid Caregivers

- **Eligible Individuals:** Eligible minor Arizona Long-Term Care (ALTCS) members who require home and community-based services (HCBS).
- **Benefits:**
  - Allows legally responsible parents to receive payment for “extraordinary” direct care services (attendant care, habilitation, personal care, and homemaker services) approved under the 1115 demonstration waiver, and
  - Parents would be limited to 40 hours of paid care, per child, in a given week and cannot exceed more than 16 hours in a single day.

# Public Comment Review

- AHCCCS formally concluded the public comment period on 8/21/23 and throughout the process AHCCCS:
  - Engaged over 1,700 stakeholders through community forums and other stakeholder meetings.
  - Received over 2,100 total pieces of feedback through verbal, chat, and email responses with the most common themes:
    - Adding habilitation as a covered service,
    - Concern with the 40 hour limitation and date of implementation,
    - Inability to find habilitation providers,
    - Countless valuable personal experiences, and many more.

# Parents as Paid Caregivers Overview



Pre-PHE (1988-2020)	During-PHE (2020-2023)	After-PHE (2023- →)
<p>No ability for parents to be paid as caregivers for their minor children</p> <p>Ability for parents of adult children (and other family members) to provide care has been a long standing feature of the ALTCS program</p>	<p>Parents as Paid Caregivers of their Minor Children- Temporary flexibility offered by CMS to address challenges presented by PHE.</p> <p>Includes:</p> <ul style="list-style-type: none"><li>- Paying parents for services such as attendant care and habilitation</li><li>- No hourly limitations</li></ul> <p>Parents of adult children (and other family members) remained in place</p>	<p>Proposal looks to continue aspects of the program including:</p> <ul style="list-style-type: none"><li>- Paying parents for attendant care <b>and habilitation</b></li><li>- 40 hour limitation for parents <b>with a phase down approach</b></li><li>- Inclusion of family support services for ALTCS members and families</li></ul> <p>Parents of adult children (and other family members) will remain in place</p>



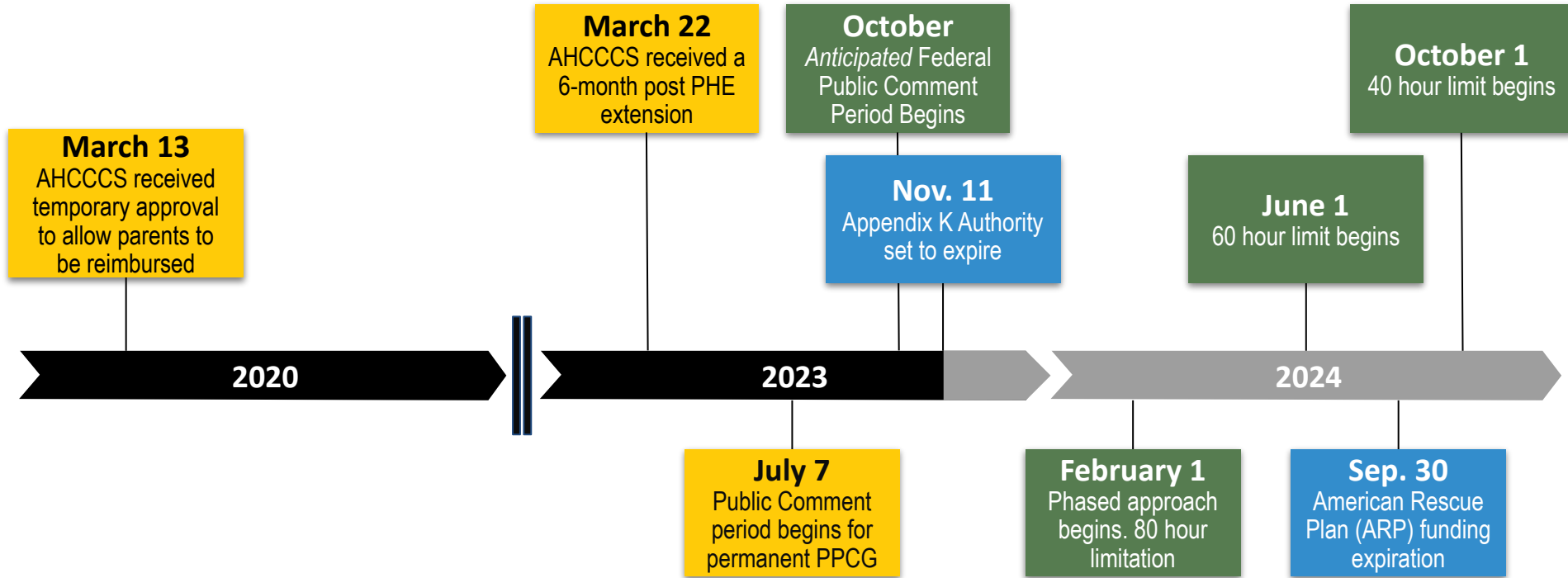
# Proposed Phased Approach

- Currently, in Arizona, there are 277 (8%) members receiving over 40 hours of paid care from their parent providers out of the total 3,454 members with parent DCWs.
- AHCCCS is proposing a phased-in approach for these families currently over the 40 hour limitation:
  - Until January 31, 2024: No hourly limitation
  - 2/1/2024 to 5/31/24: 80 hour per week limitation
  - 6/1/24 to 9/30/24: 60 hour per week limitation
  - 10/1/2024 and thereafter: 40 hour per week limitation
- Note: Recent CMS guidance allows for the automatic extension of certain PHE HCBS programs past November 11 to allow for negotiations to make programs permanent, if applicable.

# Next Steps

- AHCCCS will finalize the public comment review and submit the formal proposal to CMS within the coming weeks
- Following submission of the proposal, CMS will then undergo a federal comment period where additional comments can be submitted
- Negotiations will then begin following the federal public comment period

# Parents as Paid Caregivers - Proposed Timelines



# Operational/Policy Improvements

- Upon CMS approval, the following operational and policy modifications will be implemented:
  - Maintenance of effort for providers on workforce planning, recruitment, and retention,
  - Update to Habilitation policy including demonstrated competency requirements,
  - Focus on Respite recruitment and retention,
  - Incorporate an extraordinary care assessment into service planning, and
  - More clear definitions and guidance for “legally responsible parent.”

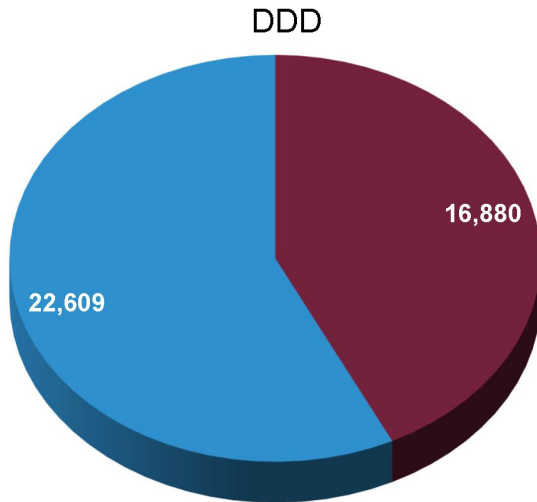
# Data Snapshot

# Data Caveats

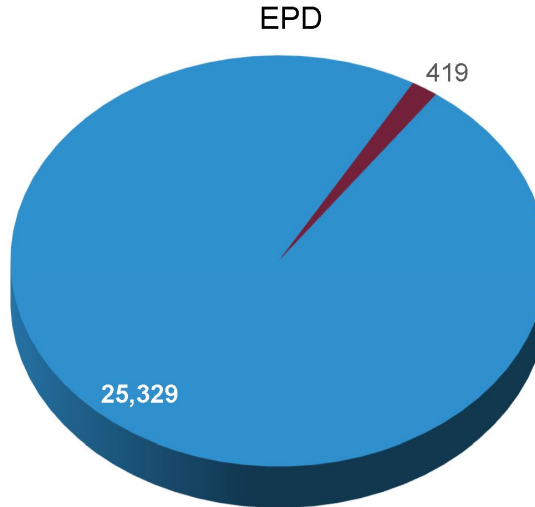
- Based on EVV data from January - March 2023 for attendant care and habilitation services,
- Reflects members under the age of 18 at the time of service,
- Currently, there is no identifier to indicate if the person delivering the in-home care service is a parent, and
- Does not include respite, IDLA habilitation (daily), group home, or day program workforces.

# Total # of Minors vs. Total Enrollment

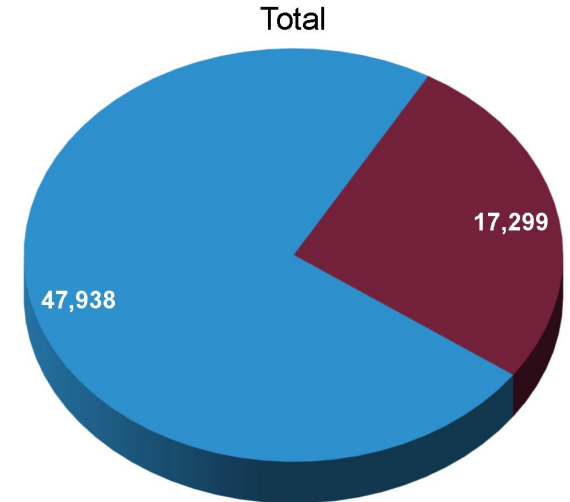
■ # of minor children living at home receiving HCBS\*   ■ Other Members



Total: 39,489



Total: 25,748



Total: 65,237

\*Data represents both parent and non-parent providers

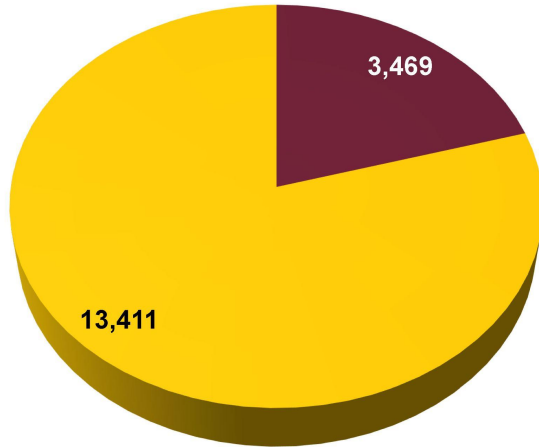


# Number of Minor Children Served by Parent

■ #of minor children served by parent

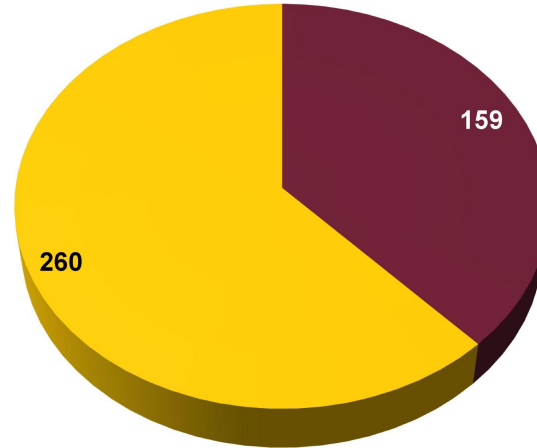
■ Minor members not served by parents

DDD



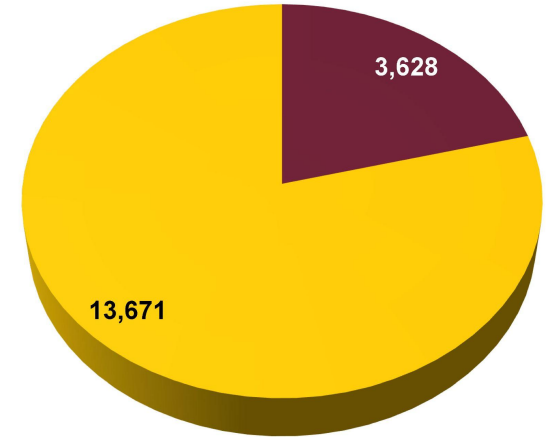
Total: 16,880

EPD



Total: 419

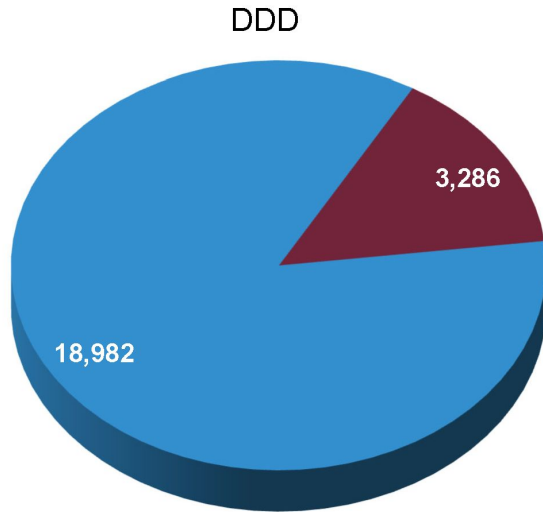
Total



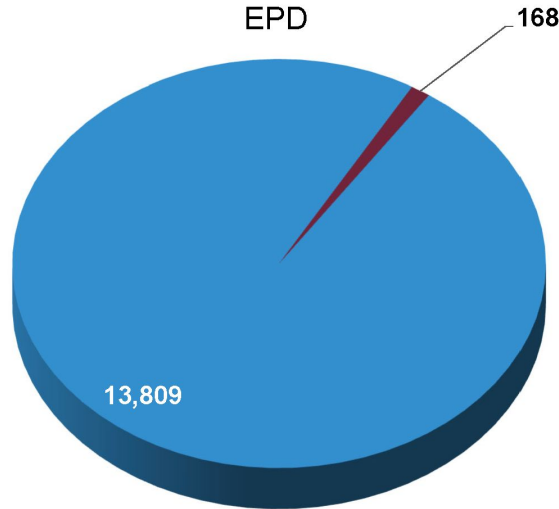
Total: 17,299

# Direct Care Worker Provider Comparison

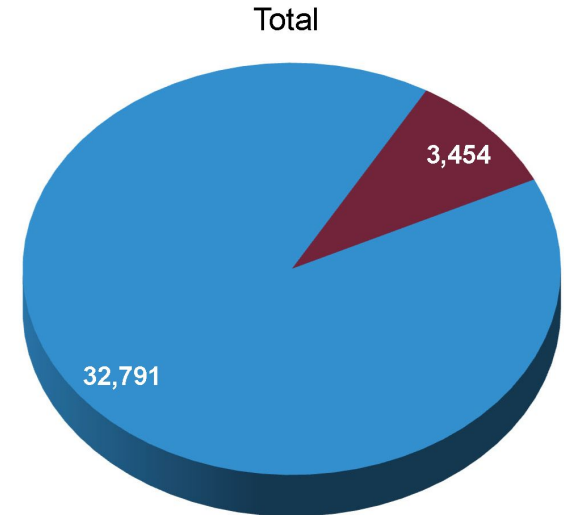
■ Total # of parent DCWs ■ Total # of other DCWs\*



Total: 22,268



Total: 13,977

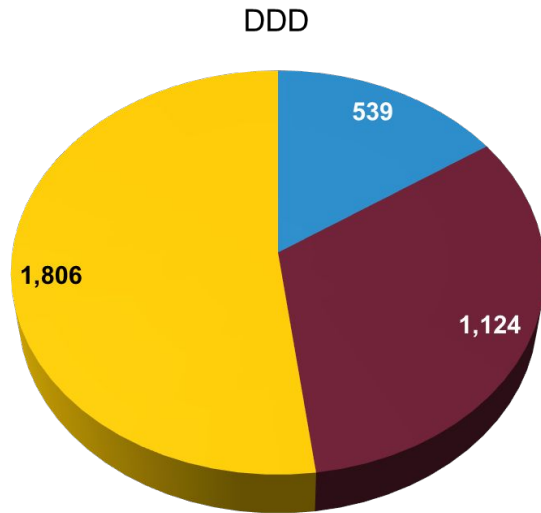


Total: 36,245

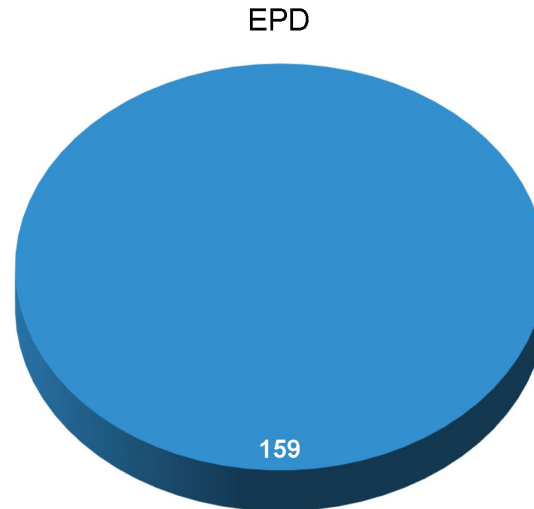
\*Total representing only those who provide ATC or HAH services ; some DCWs may serve both EPD and DDD members

# Services Provided to Minor Members by Parents

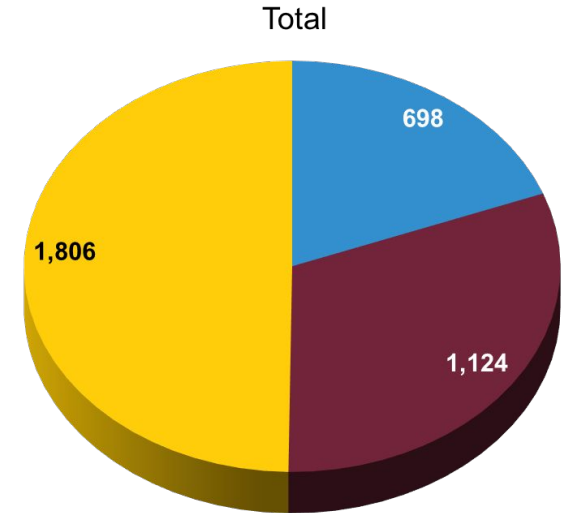
■ Attendant Care   ■ Attendant Care and Habilitation   ■ Habilitation



Total: 3,469



Total: 159

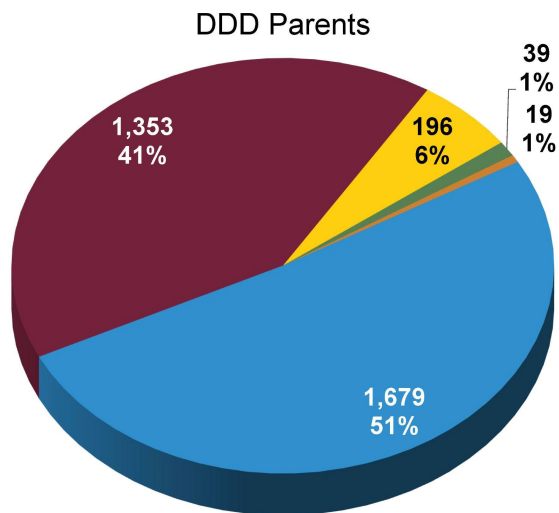


Total: 3,628

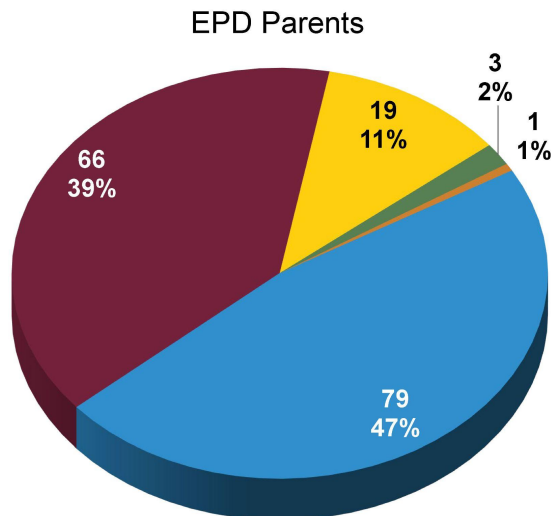
Note: The graphs represent the number of members receiving each service (or combination of services) by their parents.

# Weekly Paid Hours by Parents to their Child

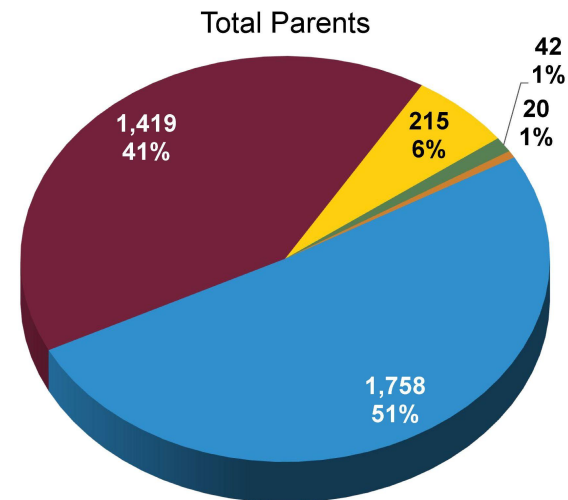
■ 0-20 ■ 21-40 ■ 41-60 ■ 61-80 ■ 80+



Total: 3,286



Total: 168



Total: 3,454

# Discussion & Questions

# Resources

# Parents as Paid Caregivers Resources

- More information on the Parents as Paid Caregivers Waiver Amendment can be found at [www.azahcccs.gov/Resources/Federal/PendingWaivers/ParentCareGivers.html](http://www.azahcccs.gov/Resources/Federal/PendingWaivers/ParentCareGivers.html).
- The web page includes a summary of Arizona's Demonstration amendment request.





## AHCCCS QUARTERLY TRIBAL CONSULTATION MEETING AGENDA

With Tribal Leaders, Tribal Members, Indian Health Services, Tribal Health Programs Operated under P.L. 93-638 and Urban Indian Health Programs

**Date and Time:** June 22, 2023 from 1:00 p.m. to 5:00 p.m. (MST)

**Location:** San Carlos Apache Healthcare, 103 Medicine Way, Peridot, AZ / Virtual

**Webinar Registration Link:** [https://ahcccs.zoom.us/webinar/register/WN\\_Sx0UgZq-T\\_W\\_xlNkTo8qAg](https://ahcccs.zoom.us/webinar/register/WN_Sx0UgZq-T_W_xlNkTo8qAg) (You will receive call-in information after registering for this meeting)

**In-Person Registration Link:** <https://forms.gle/8oCqvnqcSYNPZia66>

TIME	TOPIC	Presenter(s)	Reference Documents (please review ahead of TC)
1:00 PM – 1:20 PM	Announcements, Agenda Review & Introductions	<b>Christine Holden</b> <i>AHCCCS Tribal Liaison</i>	
1:20 PM – 1:35 PM	Welcome and Opening Prayer	<b>Victoria Began</b> <i>Chief Executive Officer San Carlos Apache Health Care</i>  <b>Steve Titla</b> <i>President of the Board of Directors San Carlos Apache Health Care</i>	
1:35 PM – 2:40 PM	AHCCCS Director Updates <ul style="list-style-type: none"> <li>• BHRF/SLH Updates</li> <li>• PHE Unwinding</li> <li>• Legislative Updates</li> </ul>	<b>Carmen Heredia</b> <i>AHCCCS Director</i>	<ul style="list-style-type: none"> <li>• <a href="#">List of Suspended Providers</a></li> <li>• <a href="#">Fact Sheet</a></li> <li>• <a href="#">Press Release</a></li> </ul>
<b>OPEN DISCUSSION</b>			

TIME	TOPIC	Presenter(s)	Reference Documents (please review ahead of TC)
DIVISION OF FEE FOR SERVICE MANAGEMENT (DFSM)			
2:40 PM – 3:15 PM	DFSM General Updates	<b>Ewaryst Jedrasik</b> <i>AHCCCS Assistant Director</i>  <b>Leslie Short</b> <i>AHCCCS Deputy Assistant Director</i>	
	OPEN DISCUSSION		
10 MIN BREAK			
DIVISION OF COMMUNITY ADVOCACY AND INTERGOVERNMENTAL RELATIONS (DCAIR)			
3:25 PM – 3:45 PM	State Plan Amendment (SPA) Updates	<b>Ruben Soliz</b> <i>AHCCCS State Plan Manager</i>	<ul style="list-style-type: none"><li><a href="#">Public Notices Webpage</a></li></ul>
	OPEN DISCUSSION		
3:45 PM – 4:10 PM	1115 Waiver Updates	<b>Maxwell Seifer</b> <i>AHCCCS Data Coordinator</i>	<ul style="list-style-type: none"><li><a href="#">Parents as Paid Caregivers</a></li></ul>
	OPEN DISCUSSION		
4:10 PM - 4:30 PM	H2O Updates & Other Initiatives	<b>Alex Demyan</b> <i>AHCCCS Assistant Director</i>	
	OPEN DISCUSSION		



4:30 PM - 4:35 PM	Policy Preview	<b>Elizabeth Da Costa</b> <i>AHCCCS Housing Administrator</i>  <b>Katelyn Murphy</b> <i>AHCCCS Clinical Program Manager</i>	
4:35 PM - 4:50 PM	Policies Open for Comment & Tribal Relations Update	<b>Christine Holden</b> <i>AHCCCS Tribal Liaison</i>	
4:50 PM – 4:55 PM	Closing Remarks	<b>Carmen Heredia</b> <i>AHCCCS Director</i>	
4:55 PM – 5:00 PM	Announcements & Adjourn	<b>Christine Holden</b> <i>AHCCCS Tribal Liaison</i>	<ul style="list-style-type: none"> <li>• <a href="#">AHCCCS Tribal Consultation Calendar</a></li> </ul>



## State Medicaid Advisory Committee (SMAC)

Quarterly Meeting  
Wednesday, July 12, 2023  
(VIRTUAL MEETING)  
**1:00 p.m. - 3:00 p.m.**

(To Join by Web)  
[SMAC Meeting Link](#)  
Password: SMAC2023!

After you click the SMAC Meeting link, at the bottom of the landing page, it will say "I'm not the meeting host, Join Meeting as an Attendee;" please click that language to register.

(To Join by Phone)  
877 853 5257 (Toll Free)  
**Meeting ID:** 895 9391 5466 **Passcode:** 777510703

### Agenda

<b>I. Attendance and Quorum Confirmation</b>	<b>Desiree Greene, Division Project Manager and SMAC Liaison</b>
<b>II. Welcome</b>	<b>Carmen Heredia, AHCCCS Director</b>
<b>III. AHCCCS Updates</b>	<b>Carmen Heredia, AHCCCS Director</b>
<b>IV. State Plan Amendments</b>	<b>Ruben Soliz, Federal Relations and Health Policy Advisor</b>
<b>V. 1115 Waiver Update</b>	<b>Shreya Arakere, Federal Waiver and Evaluation Administrator</b>
<b>VI. Targeted Investments Update</b>	<b>Cameron Adams, Program Administrator</b>
<b>VII. SMAC Updates</b>	<b>Desiree Greene, Division Project Manager and SMAC Liaison</b>
<b>VIII. SMAC Membership Assignments &amp; Voting Session</b>	<b>Vincent Torres, Associate Director Customer &amp; Community Success, Unite Us</b>
<b>IX. Call to the Public</b>	<b>Carmen Heredia, AHCCCS Director</b>
<b>X. Adjourn at 3:00 pm</b>	<b>All</b>

### SMAC Meetings

Per SMAC Bylaws, meetings are to be held the 2nd Wednesday of January, April, July and October.  
All meetings will be held from 1:00 p.m. - 3:00 p.m. unless otherwise deemed necessary by the Director.  
ASL interpretation and CART captioning services are available upon request. If you require these or other types of accommodations pursuant to the Americans with Disabilities Act (ADA), please contact the SMAC Liaison, Desiree Greene at [Desiree.Greene@azahcccs.gov](mailto:Desiree.Greene@azahcccs.gov) or 480-714-3596.



## OIFA Advisory Council Agenda

Tuesday, July 18, 2023 10:30 AM - 12:00 PM

### Zoom Link

<https://ahcccs.zoom.us/j/88141179476?pwd=LzhhcmxqaUpzZ3Q3bmdiSkZieGZCdz09>

### **Purpose:**

OIFA Advisory Council purpose is to bring together leadership of peer and family behavioral health service providers and peer and family advocacy groups to influence system structures and policies and to benefit from regular contact with each other and with AHCCCS Leadership.

### **Note:**

Reminder, this meeting will be focused on your recommendations for gathering your input on the OIFA 2024 Strategic Plan.

Introductions of first time attendees	10:30 - 10:33
Approve June Minutes	10:33 - 10:35
OIFA Updates	10:35 - 10:40
Peer Support Updates - Chaz Longwell	
OIFA 3.0 Summit - Jamie Green	
Pipeline AZ, Rabbani FurQuan	10:40 - 11:00
Solari SMI/SED Determination, Jennifer Janzen	11:00 - 11:15
Community Updates:	11:15 - 11:30
PFCA, Hayley Winterberg	
AZPFC, Kathy Bashor	
NAPFC, Laurie Verdier	
NAMI, Vicki Johnson	
Parents as Paid Caregivers Presentation	
Shreya Arakere & Maxwell Seifer	11:30 - 12:00

**Next Meeting August 15, 2023**

**Parents as Paid Caregivers Public Comment Tracker with Theme Breakdown**

The following table showcases all public comments received broken down by the subject of the letter/comment and the method it was received. Comments found within the following breakdown may be counted multiple times if they address several different subject matters. For example, an email received that provided recommendations on the 40-hour limitation and habilitation was counted once in the 40-hour limitation section and once again in the habilitation section.

COUNTA of Feedback Type (Please denote the following: Question, Comment, Recon Type of Feedback)																
Type of Meeting	40 Hour Limit	Eligibility	Family Supports	General	Geographic Concern	Grievance	Habilitation	Income	Patient Engagement	Service Description	Technology	Timeline	Training	Unrelated Question About Adult Children	Unrelated to PPCG	Grand Total
7/12 Contractor Meeting													1		2	3
7/12 SMAC Meeting Chat Response	1			3	2											6
7/12 SMAC Meeting Verbal Response	1			1	1			1			1			1		6
7/17 Community Forum	7	2			22			14	1		4		2	2		56
7/18 OIFA Advisory				1	1			1			6				2	9
7/18 Waiver Forum Chat Response	9	23		2	87			82	18	3	10		8	2		244
7/18 Waiver Forum Verbal Response	4	1		2	15			7	2		3	2	2	2		40
8/2 Waiver Forum Chat Response	18	24		12	181			133	16	23	10		27	7		451
8/2 Waiver Forum Verbal Response	2	1			16	1		5	4	1			3	1		34
Emails	206	22		13	317	15	63	447	5		104		35	115	3	1345
Grand Total	248	73		34	642	16	63	690	46	27	138	2	78	129	4	2194

COUNTA of Feedback Type (Please denote the following: Question, Comment, Recon Feedback Type (Please denote the following: Question, Comment, Recommendation))				
Type of Meeting	Comment	Question	Recommendation	Grand Total
7/12 Contractor Meeting			3	3
7/12 SMAC Meeting Chat Response	5		1	6
7/12 SMAC Meeting Verbal Response	1		4	6
7/17 Community Forum	10	43		56
7/18 OIFA Advisory	2		7	9
7/18 Waiver Forum Chat Response	147	97		244
7/18 Waiver Forum Verbal Response	13	26	1	40
8/2 Waiver Forum Chat Response	188	220	43	451
8/2 Waiver Forum Verbal Response	2	31	1	34
Emails	1201	19	125	1345
Grand Total	1569	451	174	2194



## **APPENDIX D**

# **Waiver Amendment Public Comment Letters**



## PUBLIC COMMENT OVERVIEW

### Introduction

Arizona Health Care Cost Containment System (AHCCCS) is requesting the Centers for Medicare and Medicaid Services (CMS) provide the authority to permanently extend the Parents as Paid Caregivers Program that is currently available through a temporary COVID-19 flexibility. AHCCCS is also requesting to add extended family supports to preserve a supportive home environment and mitigate access to care challenges for the Arizona Long Term Care System (ALTCs) population.

AHCCCS held a series of Parents as Paid Caregivers forums in July 2023 and August 2023 to solicit public comment on the waiver amendment. Public comment was received via the following methods:

- Direct receipt of verbal comments made during live forum sessions and live forum chats,
- Email,
- Letter, and
- Phone call.

### Volume and Type of Public Comment

The following table is a summary of all public comments received and the number of stakeholders engaged throughout the public comment period.

Event	Date	Count of Public Comments	Number of Attendees
Quarterly Tribal Consultation	6/22/2023	0	89
Quarterly Contractor Meeting	7/12/2023	3	45
State Medicaid Advisory Committee (SMAC)	7/12/2023	12	57
AHCCCS Community Forum	7/17/2023	56	265
OIFA Advisory Committee	7/18/2023	9	45
Waiver Community Forum	7/18/2023	284	563
Waiver Community Forum	8/02/2023	485	701
Waiver Email Inbox	-	739	-
<b>Total</b>		<b>1,588</b>	<b>1,765</b>

AHCCCS received several duplicative emails from stakeholders which were removed for this submission to CMS. AHCCCS received 739 emails from stakeholders, 582 of which are unique and are posted to the Parents as Paid Caregivers web page at the following link. AHCCCS would like to thank all commenters for sharing their comments, concerns, and suggestions.

All public comments can be found on the Parents as Paid Caregivers web page linked [HERE](#) or at [azahcccs.gov/Resources/Downloads/Federal/ParentsAsPaidCaregivers-AZ1115AllPublicCommentEmails.pdf](https://azahcccs.gov/Resources/Downloads/Federal/ParentsAsPaidCaregivers-AZ1115AllPublicCommentEmails.pdf)