







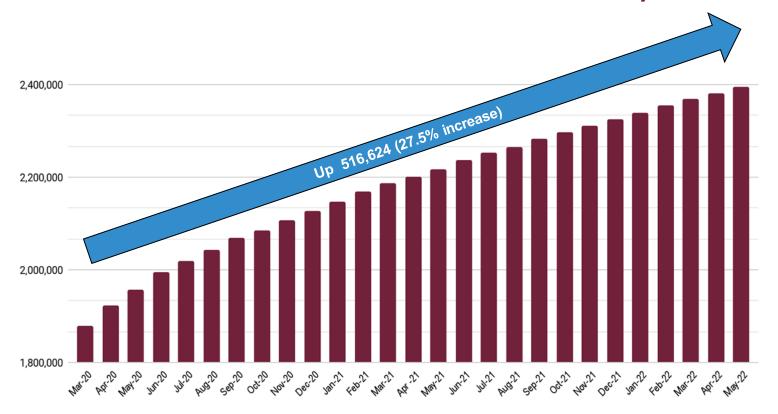
## Unwinding from the Public Health Emergency (PHE)

COVID-19 Response

May 12, 2022



#### AHCCCS Enrollment: March 2020- May 2022





#### Response to the COVID-19 Public Health Emergency

 Maintained coverage for all beneficiaries enrolled during the federally declared public health emergency

 Maintained more than 47 programmatic flexibilities including: telehealth, parents as paid caregivers, expedited provider enrollment, etc.

Distributed over \$126 million in additional pandemic relief funding

to nursing facilities, HCBS providers, hospitals, etc.

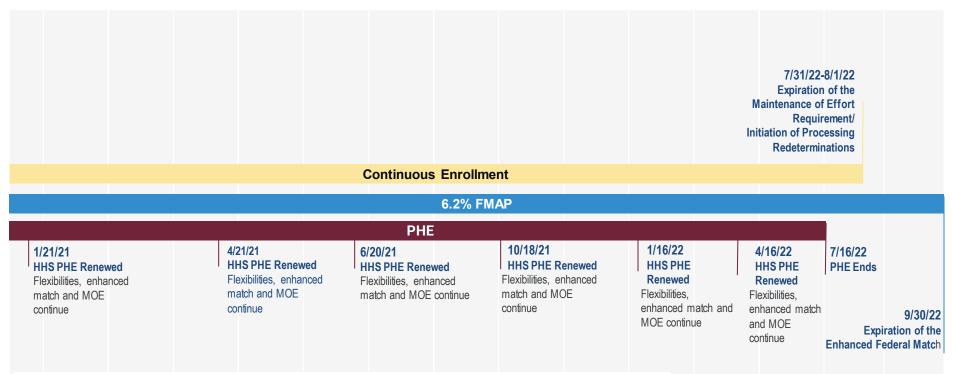
 Implemented strategies to increase COVID-19 vaccination rates among vulnerable AHCCCS beneficiaries

Achieved ALTCS vaccination rates as high as 78 percent

Maintained the <u>Crisis Counseling Program</u>, serving more than **17,000** unique individuals statewide with crisis counseling and group counseling/public education



#### PHE Renewed - Effective April 16, 2022



<sup>\*\*</sup>CMS has indicated that they will provide states with 60 days advance notice prior to ending the federally declared PHE.



# Programmatic Changes Corresponding with the End of the Federal Public Health Emergency (PHE)



#### Flexibilities to **Expire** at End of PHE

The following flexibilities will be terminated upon the end of the PHE:

- Continuous eligibility, including continuous eligibility for KidsCare enrollees
  - Note: No eligibility action will be taken on any member until the beginning of the month following the end of the PHE
- Suspension of standard prior authorization (PA) requirements
- Allowing providers licensed in another state to offer emergency and nonemergency care to AHCCCS enrollees
- Waiver of home health service requirements, including face-to-face requirements in obtaining home health services and allowing other provider types to order home health services
- Modifications to standard tribal consultation processes



#### Flexibilities to **Expire** at End of PHE

The following flexibilities will be terminated upon the end of the PHE:

- Extension of state plan paid "bed hold" days to a maximum of 30 days
- IHS/638 facility reimbursement at the outpatient all-inclusive rate (AIR) for COVID-19 vaccine administration by registered nurses under an individual or standing order
- Payment for Non-Emergency Medical Transportation (NEMT) wait time services for trips associated with a COVID-19 drive-through vaccination site



#### Flexibilities Already Terminated

The following flexibilities have already been terminated:

- Streamlined provider enrollment processes (4/24/22)
  - Waiver of enrollment fee
  - Waiver of site visit
  - Suspension of revalidation processes
- Suspension of pre-admission screening and annual resident review (PASRR) assessments
- Timely processing of KidsCare applications
- Delay in acting on certain changes in circumstances affecting KidsCare eligibility



#### Flexibilities to Be Extended Beyond the PHE

AHCCCS is seeking to continue the following flexibilities indefinitely:

- Verbal consent in lieu of written signature on plans of care for up to 30 days for ALTCS enrollees; need CMS approval
- Provision of home delivered meals to individuals served by the Department of Economic Security/Division of Developmental Disabilities; need CMS approval
- Provision of personal care services in an acute care setting when an individual requires such services for communication, behavioral stabilization, etc; need CMS approval
- 10 percent rate increase for in-office flu vaccination codes and administration
- Allowing pharmacists and pharmacy interns to administer the COVID-19 and flu vaccines



#### Flexibilities to Be Extended Beyond the PHE

AHCCCS will continue the following flexibility for an **additional 60 days** (through September 2022) following the end of the PHE:

Waiver of premiums and other cost-sharing requirements

AHCCCS will continue the following flexibility through March 31, 2024 under Section 9817 of the American Rescue Plan Act:

Allowance permitting parents to render paid care to their minor children.



#### Long Term Care Flexibilities

The following long term care flexibilities will **expire** at the **end of the quarter** in which the PHE ends (anticipated for 9/30/22):

- Removal of hourly service limitation (40 hours in 7-day period) for spouses who provide paid care
- Authority to make retainer payments to habilitation and personal care providers
- Authority to use an electronic method of service delivery: case management, personal care that requires only verbal cueing, in-home habilitation
- Ability to conduct evaluations, assessments, and person-centered service planning meeting virtually/remotely
- Allowance for electronic method of sign off on required documents such as the person-centered plan

















### After the PHE: Unwinding Changes and Preparing to Resume Normal Operations



Julie Swenson, Senior Policy Advisor

#### AHCCCS Eligibility and Enrollment During the PHE

- Renewals continued through PHE
- Approximately 600,000 "COVID override" members
  - Did not complete renewal or failed to supply needed documentation
  - Screened or determined to be ineligible
- Estimate that it will take 9 months to complete redeterminations



#### Preparing to Return to Normal Operations

- Reminders to provide updates to contact information or household circumstances and to respond to letters.
- MCOs assisting with member outreach to maintain coverage or connect individuals to alternate coverage options.
- EVERYONE can help ensure member contact information is accurate and current.
- Working with Federal partners and States to identify best practices.



#### FFS-Specific Member Outreach

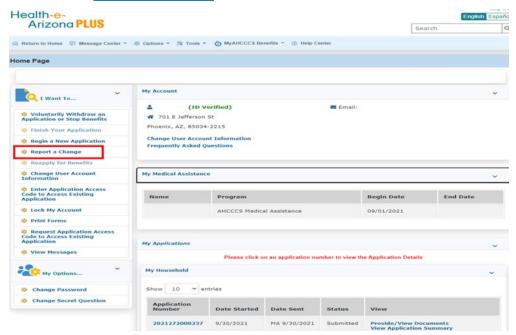
- DFSM is receiving and sharing COVID Override and Member Renewal Files
- TRBHAs and AIMHs are assisting with member outreach to maintain coverage
- Additional strategies for member outreach are being explored



#### What Can Members Do Today to Prepare?

#### **Update contact info in HEAPlus**

See this flier for more information on how to update contact info in HEAPlus





Log in or create an account at www.healthearizonaplus.gov



#### **Direct Member Outreach**

AHCCCS and the health plans are attempting to reach members who've failed to respond to requests for additional information

- 233,000 members to receive robocalls from AHCCCS beginning April 8
- Text messages to AHCCCS opt-ins, plus new text outreach to all mobile numbers on file with AHCCCS
- 376,000 households sent a generic reminder letter in April
- Renewal requests from AHCCCS by US mail asking for information to confirm eligibility
- MCOs to help locate members whose mail has been returned as undeliverable



#### Returning to Normal Operations

- Full redetermination when eligibility was extended
- Will receive one of two letters Renewal approval or request for more information
- If not eligible, customers will receive advance notice and appeal rights
- Align redetermination and renewal actions at household level
- Distribute all member renewals evenly over 12-month unwinding period

















#### **DFSM COVID Unwinding Updates**

Ewaryst Jedrasik, RN, DFSM Deputy Assistant Director





#### DFSM COVID-19 Flexibilities

• Link to the current memo:

azahcccs.gov/AHCCCS/Downloads/COVID19/AHCCCSPriorAuthorization.pdf



#### **Behavioral Health**

- Anticipated effective date July 16, 2022(based on current last day of the PHE), current concurrent review prior authorization for Behavioral Health Inpatient Residential Treatment Center (RTC) will resume to a concurrent review frequency of every 30 days. Reviews for Behavioral Health Residential Facilities (BHRF) will continue at concurrent review intervals of up to 90 days.
- Providers should continue to work with the TRBHA and outpatient treatment teams for ongoing care coordination and discharge planning needs.



#### Pharmacy

- Prior authorization continues to be waived for compounded drugs at a cost of up to \$75.00 for children less than ten years of age.
- 42 CFR 456.705 and the Arizona State Board of Pharmacy requires that members receive counseling when prescriptions are dispensed. Effective July 16, 2022 AHCCCS FFS will reinstate the Arizona State Board of Pharmacy member signature requirement to confirm that counseling occurred.



## Non-Emergency Medical Transportation (NEMT) Services

- Changes were implemented to the flexibilities related to the <u>COVID-19 DFSM memo</u>. The following requirements will be reinstated.
  - o Effective 8/1/2021, NEMT providers transporting a member over 100 miles must obtain prior authorization.
  - Effective July 1, 2022 AHCCCS NEMT drivers are required to collect a passenger's written or electronic signature on the FFS Trip Ticket.



#### Physical Health Services Update

- Anticipated 7/16/2022 the following changes will be implemented to the flexibilities related to the facility services:
- DFSM will reinstate prior authorization and concurrent review requirements for the following levels of care:
  - Acute Inpatient hospitalization;
  - Assisted Living Facilities/Centers;
  - Skilled Nursing Facilities (SNFs); and
  - Inpatient Rehabilitation Facilities (e.g., Long Term Acute Care Hospitals).
- Prior Authorization approvals for elective inpatient services will continue to be extended as medically appropriate.



#### Other Flexibilities

- It is anticipated that with the end of the COVID-19 Public Health Emergency, the use of Alternative Care Sites (ACS) established by Indian Health Service (IHS) or Tribally owned/operated 638 facilities will end on 07/16/2022.
- Separately and consistent with CMS Guidance issued on 10/4/21, AHCCCS DFSM does not intend to review claims related to the Four Walls provision until nine months after the end of the COVID-19 PHE. More information from CMS can be found here: <u>CIB Informational Bulletin - Four Walls</u>



#### Thank You.

Have a great day!

