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March 6, 2017

Meggan Harley
Chief Procurement Officer
Arizona health Care Cost Containment System
801 E. Jefferson Street
Phoenix, AZ 85034

Re: *Compliance Action - Notice to Cure (QOC)*

Dear Ms. Harley,

Cenpatico Integrated Care (C-IC) regards the health and safety of members to be the highest priority for our organization. Accordingly, C-IC is addressing with the utmost seriousness the concerns raised in the Notice to Cure dated 3/1/17 regarding contractual requirements as outlined in RBHA Contract Section 10, Quality Management and AHCCCS Medical Policy Manual Chapter 960.

Upon the initial contact from AHCCCS, C-IC Quality Management (QM) took immediate action to secure the safety of members and educate staff on the critical importance and urgency of referral of quality of care concerns to QM. We acknowledge, however, that existing processes must be strengthened to identify and refer potential quality of care issues to the Quality Department, as well as ensure employees understand effective lines of communication and referral processes to compliance. As part of our review process, C-IC is leveraging the support of its corporate partner, Centene, to engage outside legal counsel in conducting an independent and thorough investigation of the surrounding facts regarding the complaint at issue. The attorneys were on-site at C-IC February 27-28, 2017 to interview staff and gather and review documentation. We anticipate a comprehensive report of their findings in the coming days and will communicate these to AHCCCS. The investigation may result in additional actions to address the findings.

An internal review process has also been underway. C-IC has conducted a root cause analysis and established a process to more closely monitor complaints to ensure the timely provision of quality care and services and that staff work within their scope or responsibility. The attached plan of action provides the multiple steps C-IC is taking to revise current policies and procedures, shore up existing processes and better train our employees.

Each area where a deficiency was identified has a corresponding action plan. Policies across multiple areas will be updated to reflect the action plan. For example, the C-IC Immediate Jeopardy (IJ) policy will be revised to clearly articulate the Director of Quality Management as lead and define the participants and their roles in IJ situations to eliminate confusion and streamline workflow. Additional steps C-IC will take

include offering more comprehensive education for all staff on the differences between grievances, complaints and quality of care concerns and the reporting, evaluation and resolution of quality of care concerns. More importantly, there will be a much more rigorous follow-up to employee training, including a face-to-face training campaign by Compliance in partnership with Quality Management, as well as ongoing training and quarterly reviews, to ensure staff competency with the subject matter. C-IC is also evaluating employee disciplinary actions where appropriate. C-IC Compliance is conducting an internal audit of all complaints over the past calendar year. This way we can identify any deficiencies in the referral of quality of care concerns, conduct the appropriate investigations and report to AHCCCS as needed.

We are building a culture of continuous improvement. As such, C-IC fully embraces this opportunity to refine and improve our processes and procedures related to ensuring timely quality of care investigations for all members. The processes we are establishing through this action plan will help us identify gaps and/or barriers, devise plans to address those gaps or barriers, monitor improvements and make enhancements across the delivery system for AHCCCS members in a timely fashion. We greatly value your partnership with us and we look forward to our continued collaboration to improve the health and wellness of our communities.

Respectfully submitted,

James Stover, Chief Executive Officer

Cc:

Virginia Rountree, AHCCCS
Sharon Ormsby, AHCCCS
Vanessa Templeman, AHCCCS
Jakenna Lebsock, AHCCCS
Christina Quast, AHCCCS
Ena Binns, AHCCCS
Paul Barnes, Centene
Kimberly Lancaster, Centene/C-IC
Dr. Richard Rhoads, Centene/C-IC
Michele Barnard, Centene/C-IC
Lisa Stutz, Centene/C-IC
Susan Wortman, Centene/C-IC

Enclosures