AHCCCS Works Arizona's Work Requirements Program

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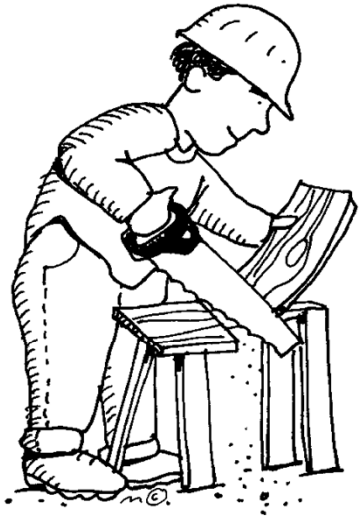

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Flexibilities Overview

- March 14, 2017: HHS/CMS sent letter encouraging states to seek flexibilities in administration of Medicaid programs
- November 17, 2017: AHCCCS submitted concept paper to CMS
- January 11, 2018: CMS sent guidance on Community Engagement waiver requests to State Medicaid Directors

AHCCCS Works

- On December 19, 2017, AHCCCS submitted a request to CMS to implement AHCCCCS Works
- To qualify for AHCCCS coverage, certain able-bodied adults 19-49 who do not qualify for an exemption must, for at least 80 hours per month:
  - Be employed or actively seek employment;
  - Attend school; or
  - Participate in employment support and development activities.
- Negotiations with CMS ongoing
- Operational workgroups defining policy parameters and system requirements in preparation for waiver approval
- Four states' waivers approved to date: Kentucky, Indiana, Arkansas, New Hampshire

AHCCCS
Arizona Health Care Cost Containment System

Reaching across Arizona to provide comprehensive quality health care for those in need

5

Governor and AHCCCS Director worked to not have the program be punitive.

Sought significant community stakeholder input prior to waiver submission.

First Flexibility Proposal: Waiver of Prior Quarter Coverage

- Currently, Arizona covers enrollees three months prior to the month of application if the enrollee would have been eligible at any point during those months
- Amendment submitted on April 6, 2018 proposes limiting retroactive coverage to the month of application, consistent with AHCCCS policy prior to 2014
- AHCCCS expects CMS to approve Prior Quarter Coverage waiver in the same package as AHCCCS Works

Second Flexibility Proposal: AHCCCS Works Waiver

- On December 19, 2017, AHCCCS submitted a request to CMS to implement AHCCCS Works
- Able-bodied adults aged 19-49 who are not subject to mandatory managed care and do not qualify for an exemption must, for at least 80 hours per month:
  - Be employed;
  - Actively seek employment;
  - Attend school (less than full time);
  - Participate in other employment readiness activities, i.e., job skills training, life skills training & health education; or
  - Partake in community service.

Background & Landscape

- Senate Bill 1092, passed in 2015 requires AHCCCS to request work requirement and lifetime limit annually
- CMS has approved 4 states' waivers to date (Kentucky, Indiana, Arkansas and New Hampshire)
- Arkansas went live June 1
- KY going live in part of state as of July 1 and ruling on request for an injunction expected by then
- AHCCCS/CMS negotiations in final phase

Exemptions, part 1

- Pregnant women and postpartum 60 days
- Former foster care youth up to age 26
- Individuals receiving temporary or permanent long-term disability benefits (private or government), including workers compensation
- Individuals determined to be medically frail, incl. those who have:
  - a chronic Substance Use Disorder
  - a serious and complex medical condition
  - a disability that significantly impairs ability to perform at least 1 Activity of Daily Living
- Individuals determined to have a Serious Mental Illness
- Individuals who are in active treatment with respect to a Substance Use Disorder

Exemptions, part 2

- Full time high school, trade school, college or graduate students
- Individuals receiving benefits under SNAP or a Cash Assistance Program like TANF
- Individuals receiving Unemployment Insurance income
- Individuals who are homeless
- Victims of domestic violence
- Designated caretaker of a child 18 or under
- Caregiver who is responsible for the care of an individual with a disability

Reporting & On-going Compliance

- Three-month Community Engagement Orientation Period
- Monthly reporting required (any combination of at least 80 hours per month by the 10th day of the following month)
- Non-compliance results in AHCCCS sending the member a Notice of Suspension on the 11th day of the month
- Suspension will occur on the first day of the month after the Notice of Suspension was sent unless, prior to the effective date:
  - good cause for non-compliance reported and verified;
  - Member intends to appeal the suspension; or
  - The member reports and verifies that s/he currently no longer subject to the requirements (changed eligibility groups or exemption applies)

Compliance Example

January	February	March	April	May	June
COMPLIANCE Member engages in 80 hours of community engagement activities in January	**NON-COMPLIANCE** Member fails to engage in at least 80 hours of community engagement activities in February	**NOTICE SENT** Notice of Suspension sent on Mar. 11 and member does not report good cause, other exemption, or initiate appeal	**SUSPENSION** Member's enrollment is suspended for two months beginning on April 1st	**SUSPENSION** Reminder notice sent re: automatic re-enrollment & compliance / reporting requirements	**AUTO RE-ENROLL** Member is automatically re-enrolled as of June 1st

Plan Requirements

- Eligibility and enrollment monitoring - baseline metrics will be informed by state data and targets benchmarked against performance in best practice settings.
- Plan administrative responsibility including reconciliations will be required
  - Timely accurate notices to beneficiaries including ability for beneficiaries to respond
  - Ensure application assistance is available to beneficiaries (in person and by phone)
- Substantial reporting, such as:
  - Number and percentage of beneficiaries who are required to comply with AW
  - Number and percentage of beneficiaries who are exempt
  - Number and percentage requiring good cause exemptions
  - Number and percentage receiving “reasonable accommodations”
  - Number and percentage of beneficiaries using community service category toward 80 hours (released from justice system, living in areas of high unemployment)

- Etc., etc., etc.

How does the plan get reimbursed for managing a member during suspension when we have to maintain communication, tracing, etc.? During a suspension, typically the plan doesn’t get a premium for that month. It is under consideration with AHCCCS!

QUESTIONS?

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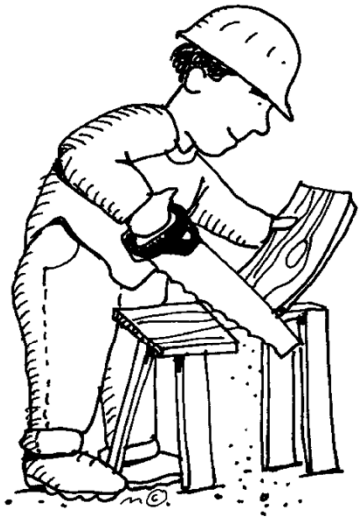

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