



**Contract Year Ending 2022  
Capitation Rate Notification - Access to  
Professional Services Initiative  
Regional Behavioral Health Authority Program**

**October 1, 2021 through September 30, 2022**

**Prepared for:  
The Centers for Medicare & Medicaid Services**

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# CYE 22 Capitation Rate Notification – APSI, RBHA Program

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# CYE 22 Capitation Rate Notification – APSI, RBHA Program

## Introduction and Limitations

The purpose of this capitation rate notification document is to provide documentation of the data, assumptions, and methodologies used to allocate a delivery system and provider payments initiative (i.e., state directed payment), the Arizona Health Care Cost Containment System (AHCCCS) Access to Professional Services Initiative (APSI), across the Contract Year Ending 2022 (CYE 22, October 1, 2021 through September 30, 2022) capitation rates for the Regional Behavioral Health Authority (RBHA) Program.

The APSI payments are payments under 42 CFR § 438.6(c)(1)(iii)(B), as codified in the 2016 Medicaid and Children’s Health Insurance Program (CHIP) Managed Care Final Rule. This capitation rate notification document was prepared for Centers for Medicare & Medicaid Services (CMS), or its actuaries, for review of the APSI payments allocation methodology. This capitation rate notification document also provides the CYE 22 RBHA Program capitation rates with and without the APSI payments for CMS review. This capitation rate notification document may not be appropriate for any other purpose.

This capitation rate notification document may also be made available publicly on the AHCCCS website or distributed to other parties. If this capitation rate notification document is made available to third parties, then this capitation rate notification document and the original rate certification along with any amendments should be provided in their entirety. Any third party reviewing this capitation rate notification document and capitation rate certifications should be familiar with the AHCCCS Medicaid managed care program, the provisions of 42 CFR Part 438 applicable to this rate certification, the 2021-2022 Medicaid Managed Care Rate Development Guide (2022 Guide), Actuarial Standards of Practice and generally accepted actuarial principles and practices.

CMS has yet to release a rate development guide for capitation rate updates related to payments under 42 CFR § 438.6(c). In lieu of having an official guide to follow, AHCCCS will follow the 2022 Guide for organizing this capitation rate notification document. The 2022 Guide describes the rate development standards and appropriate documentation to be included within Medicaid managed care rate certifications. In particular, Section I.4.D. covers state directed payments and it is this section that will contain the capitation rate notification documentation. Sections of the 2022 Guide that do not apply will be marked as “Not Applicable” and will be included in this rate notification document for completeness.

## Section I Medicaid Managed Care Rates

### I.1. General Information

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

### I.2. Data

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

### I.3. Projected Benefit Costs and Trends

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

### I.4. Special Contract Provisions Related to Payment

#### I.4.A. Incentive Arrangements

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

#### I.4.B. Withhold Arrangements

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

#### I.4.C. Risk-Sharing Mechanisms

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

#### I.4.D. State Directed Payments

##### I.4.D.i. Rate Development Standards

This section of the 2022 Guide provides information on delivery system and provider payment initiatives authorized under 42 CFR § 438.6(c).

##### I.4.D.ii. Appropriate Documentation

The following sections of the 2022 Guide, Section I.4.D.ii.(a)(i) through Section I.4.D.ii.(a)(iii), were provided in the CYE 22 RBHA Program Capitation Rate Certification as signed by Erica Johnson and Windy Marks on August 11, 2021. These sections are being provided again to facilitate CMS' review, updated as necessary to provide additional information. There was one amendment to the CYE 22 rate certification which did not impact APSI. The amendment was signed on January 6, 2023, relating to costs associated with the Targeted Investments Program and the American Rescue Plan Act Home and Community Based Services Behavioral Health Outpatient directed payments.

##### I.4.D.ii.(a) Description of State Directed Payments

###### I.4.D.ii.(a)(i) Type and Description of Directed Payment Arrangements

The APSI seeks to provide enhanced support to certain professionals in order to (1) preserve and enhance access to these professionals who deliver essential services to Medicaid recipients in Arizona and (2) support professionals who are critical to professional training and education efforts. The APSI is a program to preserve and promote access to medical services through a uniform percentage increase

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to the Contractors’ rates for professional services provided by qualified physicians and non-physician professionals affiliated with designated hospitals who meet the following definition:

- A hospital facility with an ACGME-accredited teaching program and which is operated pursuant to the authority in Arizona Statute Title 48, Chapter 31; or,
- A hospital facility with:
  - An ACGME-accredited teaching program with a state university, and
  - AHCCCS inpatient discharge utilization volume greater than or equal to 30 percent as calculated by the Arizona Department of Health Services for calendar year 2014; or,
- A freestanding children’s hospital or a pediatric unit of a general acute care hospital with greater than one hundred (100) licensed pediatric beds, excluding nursery beds.

The APSI provides a uniform percentage increase of 59% to otherwise contracted rates for qualified practitioners for all claims for which AHCCCS is the primary payer. The rate increase is intended to supplement, not supplant, payments to eligible providers. The uniform percentage increase of 59% was reduced from the 62% increase documented in the original capitation rate certification signed on August 11, 2021, based on CMS’ recent approval of an amendment to the APSI preprint (AZ\_Fee\_AMC\_Amend\_20211001-20220930, approved by CMS September 15, 2023) to ensure the total payments to the eligible providers would not exceed 100% of average commercial rates.

### **I.4.D.ii.(a)(ii) Directed Payments Incorporated in Capitation Rates**

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

### **I.4.D.ii.(a)(iii) Directed Payments Under Separate Payment Arrangement**

The APSI was not included in the RBHA certified capitation rates and has been paid out via lump sum payments.

### **I.4.D.ii.(a)(iii)(A) Aggregate Amount**

The original estimates of anticipated payments, including premium tax, for APSI were approximately \$6.8 million. AHCCCS distributed the total payment via four quarterly lump sum payments each equal to 20% of the estimated amount to the Contractors, and a final lump sum payment after the completion of the contract year which equaled the difference between the quarterly payments and the actual annual rate increase calculated based on encounter data for the contract year. The total payments paid through the RBHA Contractors for the APSI were \$7.9 million, inclusive of premium tax.

### **I.4.D.ii.(a)(iii)(B) Actuarial Certification of the Amount of the Separate Payment Term**

The actuaries certified to the aggregate directed payment estimates as actuarially sound according to 42 CFR § 438.4 in the original rate certification. The original estimates were based on projections of future events. This notification document incorporates the actual final aggregate payments by rate cell and the actuaries certify the final payment amounts by rate cell as actuarially sound according to 42 CFR § 438.4.

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### **I.4.D.ii.(a)(iii)(C) Estimated Impact by Rate Cell**

Appendix 1 shows the total APSI dollars paid, including premium tax, by rate cell. Appendix 2 shows the APSI payments by rate cell as if they had been incorporated into the capitation rates as PMPMs. Totals may not add up due to rounding.

### **I.4.D.ii.(a)(iii)(D) Preprint Acknowledgement**

These payments were made under the APSI 42 CFR § 438.6(c) payment arrangement in a manner consistent with the preprints approved by CMS (inclusive of any/all correspondence between the state and CMS regarding the preprint).

### **I.4.D.ii.(a)(iii)(E) Future Documentation Requirements**

AHCCCS is submitting this notification document to CMS which incorporates the total amount of the APSI payments into the rate certification's rate cells, consistent with the distribution methodology described in the preprint approved by CMS. The capitation rates with and without the APSI payments can be found in Appendix 2.

### **I.4.E. Pass-Through Payments**

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

### **I.5. Projected Non-Benefit Costs**

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

### **I.6. Risk Adjustment and Acuity Adjustments**

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

## **Section II Medicaid Managed Care Rates with Long-Term Services and Supports**

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

## **Section III New Adult Group Capitation Rates**

Not applicable to the APSI for the CYE 22 RBHA Program rate update.

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### Appendix 1: CYE 22 APSI Payments

GSA	Rate Cell	CYE 22 APSI Dollars with Premium Tax
Central	SMI	\$4,994,880
Central	Crisis 24 Hour Group	\$0
North	SMI	\$156,918
North	Crisis 24 Hour Group	\$0
South	SMI	\$2,792,267
South	Crisis 24 Hour Group	\$0
Total		\$7,944,065

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### Appendix 2: CYE 22 Certified and Adjusted Capitation Rates

		Capitation Rates Effective 10/1/21 - 9/30/22		
GSA	Rate Cell	Cap Rates without APSI	APSI PMPM	Cap Rates with APSI
Central	SMI	\$2,593.76	\$15.40	\$2,609.15
Central	Crisis 24 Hour Group	\$7.04	\$0.00	\$7.04
North	SMI	\$1,647.48	\$1.98	\$1,649.47
North	Crisis 24 Hour Group	\$4.13	\$0.00	\$4.13
South	SMI	\$1,618.86	\$15.50	\$1,634.36
South	Crisis 24 Hour Group	\$7.46	\$0.00	\$7.46