

Arizona Section 1115 Waiver Amendment Request:

AHCCCS Works



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I. Summary

In accordance with A.R.S. <u>36-2903.09</u>, the Arizona Health Care Cost Containment System (AHCCCS) is seeking to implement the following for certain adults receiving Medicaid services:

- The requirement to become employed, actively seek employment, attend school, or partake in Employment Support and Development (ESD) activities, with exceptions discussed below.
- The requirement to verify monthly compliance with the above requirements.
- The authority to limit lifetime coverage for "able-bodied adults" to five years, with exceptions discussed below.
- The authority to implement cost-sharing for non-emergency use of the Emergency Department and ambulance transport.

Arizona respectfully requests that the Centers for Medicare and Medicaid Services (CMS) waive sections of federal law and regulation as outlined below to the extent needed to effectuate these changes. The following proposal includes some programmatic features that were initially approved by CMS on January 18, 2019, but later rescinded on February 12, 2021. Arizona has reviewed the previous 2019 submission and made modifications to reflect changes in Arizona's population and workforce needs.

II. Background

In 2015, the Arizona State Legislature passed Bill 1092, requiring AHCCCS to submit to CMS three 1115 Demonstration Waivers that:

- 1. Institute a work requirement for all "able-bodied adults" receiving Medicaid services,
- 2. Place on "able-bodied adults" a lifetime limit of five years of Medicaid benefits,
- 3. Develop and impose meaningful cost-sharing requirements to deter both the nonemergency use of emergency departments and the use of ambulance services for nonemergency transportation or when it is not medically necessary.

On December 19, 2017, AHCCCS submitted a formal 1115 Waiver Amendment Request titled "AHCCCS Works." This amendment request would require non-exempt "able-bodied adults" between the ages of 19 and 55 to complete qualifying employment or educational activities for at least 20 hours per week to qualify for AHCCCS coverage.

On January 18, 2019, CMS approved Arizona's "AHCCCS Works" request where the Demonstration Special Terms and Conditions specified that the state would implement the AHCCCS Works requirement no sooner than January 1, 2020. Implementation work for the program began and then was later halted in October 2019 due to ongoing litigation of similar Medicaid Work Requirement 1115 Demonstration Waivers. This program was then further delayed by the Public Health Emergency (PHE) in January 2020. The approval and subsequent authority for AHCCCS Works was then rescinded by CMS on February 12, 2021.

III. Overview

Social and economic factors, such as educational attainment and employment, can impact a person's health status. A number of studies have shown that employed individuals are both physically and mentally healthier, as well as more financially stable, as compared to unemployed individuals. AHCCCS seeks to support Arizonans in pursuing their educational goals, building their technical skills, and gaining the income, independence, and fulfillment that come with employment.

To further this objective, Arizona proposes to encourage workforce participation for "able-bodied" members (defined as physically and mentally capable of working and not medically frail) who are at least 19 years old and fall within the definition of the Social Security Act (SSA) Section 1902(a)(10)(A)(i)(VIII) (henceforth referred to as the "Group VIII" population, who are individuals with incomes between 0 and 138% of the Federal Poverty Level (FPL) who do not qualify for Medicaid in any other category). Workforce participation may include: verifying that they are employed, attending school, participating in ESD activities, or any combination of these, for at least 20 hours per week. Individuals who are seeking employment would also fulfill the workforce participation requirement, consistent with those required to obtain unemployment benefits in the State of Arizona.^{2 3} Collectively, these activities are hereafter referred to as "AHCCCS Works" activities.

Certain individuals would be exempt from AHCCCS Works activities. Exempt populations are detailed in Section III below. The comprehensive list of exemptions was originally compiled in 2017 and informed through the robust public engagement process that AHCCCS undertook while preparing its initial AHCCCS Works waiver request. At that time, AHCCCS received hundreds of comments from various stakeholders.

AHCCCS will work with the Arizona Department of Economic Security (DES) to promote synergies between existing workforce development programs that support Arizonans, and will also create new supports to empower members. This will require an investment to scale existing programs and enhance infrastructure. Arizona requests the authority to leverage Medicaid funding to support these enhancements, which are designed to ensure AHCCCS enrollees have opportunities to meet the proposed requirements. The gains in education and employment that will result from this initiative will facilitate and enhance positive health outcomes for Arizonans.

Similarly, Arizona will put processes and procedures in place, including data sharing among state agencies and programs, to ensure efficiency in determining whether members are meeting employment and community engagement requirements.

³ AHCCCS will work with CMS on the implementation of how those employment search requirements will be monitored.



¹ See, e.g., F.M. McKee-Ryan, Z. Song, C.R. Wanberg, and A.J. Kinicki. (2005). Psychological and physical well-being during unemployment: a meta-analytic study. Journal of Applied Psychology, 90 (1), 53-76. K.I. Paul, E; Geithner, and K. Moser. (2009). Latent deprivation among people who are employed, unemployed, or out of the labor force. Journal of Psychology, 143 (5), 477-491. Hergenrather K, Zeglin R, McGuire-Kuletz M, and Rhodes S. Employment as a Social Determinant of Health: A Systematic Review of Longitudinal Studies Exploring the Relationship Between Employment Status and Physical Health. esdRehabilitation Research, Policy, and Education. 2015;29(25):2-26. Hergenrather K, Zeglin R, McGuire-Kuletz M, and Rhodes S. Employment as a Social Determinant of Health: A Systematic Review of Longitudinal Studies Exploring the Relationship Between Employment Status and Mental Health. Rehabilitation Research, Policy, and Education. 2015; 29 (30): 261-290.

² In Arizona, to be eligible to receive unemployment benefits, individuals both engage in a "systematic and sustained effort to obtain work during at least four different days of the week" and make at least one job contact on each of those days. https://des.az.gov/services/employment/unemployment-individual/instructions-completing-weekly-claim-ui-benefits. Individuals must report compliance weekly.

Pursuant to Arizona Revised Statutes (A.R.S) § 36-2903.09, AHCCCS also requests a five-year maximum lifetime coverage limit for "able-bodied adult" members who are subject to the above requirement and do not fall under one of the exemptions. The five-year maximum lifetime coverage limit would become effective on the date of approval by CMS, and would not be retroactive to include previous times a person received Medicaid benefits.

IV. Waiver Amendment Proposal Details

A. Proposed Additional Eligibility Requirements under the Demonstration as Amended.

AHCCCS Works Requirements

Applicability

The AHCCCS Works requirements in this waiver amendment apply to all "able-bodied" members who are 19-55 years old, fall within the Medicaid new adult group (Group VIII), and are not otherwise exempt. The new adult group population includes individuals with incomes between 0 and 133% federal poverty level (FPL) — 138% including the 5% Modified Adjusted Gross Income [MAGI] income disregard — who do not qualify for Medicaid in any other eligibility category. These groups are often referred to in Arizona as the <u>Proposition 204</u> group (0 - 100% FPL) and the Adult Expansion group (100 - 133% FPL).

The AHCCCS Works requirements will not apply to individuals who meet any of the following conditions:

- Individuals who are at least 56 years old;
- Individuals who qualify for services through the Indian Health Service or Tribally-Operated Health Facilities, including but not limited to enrolled or affiliate members of federally-recognized American Indian/Alaskan Native (AI/AN) Tribes;
- Women up to the end of the 12-month postpartum period;⁴
- Former Arizona foster youths up to age 26;
- Individuals determined to have a serious mental illness (SMI);
- Individuals who are in active treatment with respect to a substance use disorder (SUD);
- Individuals currently receiving temporary or permanent long-term disability benefits from a private insurer or the government;
- Individuals who are receiving Supplemental Nutrition Assistance Program (SNAP), Cash Assistance, or Unemployment Insurance income benefits;
- Individuals who are determined to be medically frail;
- Full-time high school students who are older than 18 years old;
- Full-time trade school, college or graduate students;⁵
- Victims of domestic violence;
- Individuals who are homeless;
- Individuals who have recently been directly impacted by a catastrophic event such as a natural disaster or the death of a family member living in the same household;
- Parents, caretaker relatives, foster parents, and legal guardians (per A.R.S. 14-5209);

⁵ Defined as 12 hours/week for undergraduate programs, 9 hours/week for graduate programs.



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⁴Arizona currently provides 12-months of postpartum coverage to Medicaid-eligible pregnant individuals as described in section 1902(e)(16) of the Social Security Act.

- Individuals who are exempt from the Arizona Department of Economic Security (DES) Nutrition Assistance Work Requirement programs⁶;
- Individuals who were incarcerated within the last six months;
- Veterans regardless of the discharge status; or
- Caregivers of a family member who is enrolled in the Arizona Long Term Care System (ALTCS).

It is important to note that by limiting these policies to Group VIII, some of the populations listed above do not automatically fall under the AHCCCS Works requirement provisions by virtue of their eligibility category (e.g., parents and caretaker relatives, postpartum women, former foster youth). However, we are noting their exemption here for transparency purposes, particularly due to stakeholder concerns about applying the requirements to vulnerable populations.

Requirements

"Able-bodied adult" members will be required to meet the following activities or combination of activities, for at least 20 hours per week to qualify for AHCCCS:

- Be employed;
- Attending school;⁷ or
- Attending an ESD program. The definition of an ESD program includes:⁸
 - English as a Second Language courses;
 - Parenting classes;
 - Disease management education;
 - Courses on health insurance competency; and
 - Healthy Living Classes.

In addition, individuals who engage in job search activities similar to those required to receive unemployment benefits in Arizona would be deemed as meeting the AHCCCS Works requirements. This requires individuals to engage in a "systematic and sustained effort to obtain work during at least four different days of the week" and make at least one job contact on each of those days.

For individuals who are transitioning from the justice system, living in an area of high unemployment, or who otherwise face a significant barrier to employment, community service hours may count toward the required 20 hours per week.

Members subject to this requirement who do not qualify for an exemption and fail to meet the requirements will receive an initial 6-month grace period. Failure to comply after the grace period will result in a two-month suspension period unless the member reports and verifies that there was a good cause for non-compliance or initiates an appeal of the suspension. If, after the two-month suspension, the beneficiary meets all other eligibility criteria, eligibility will be automatically reinstated. Example circumstances giving rise to good cause may

⁸ AHCCCS will determine the qualifying Employment Support and Development programs, as well as allowable community service activities, through a public process.



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⁶ A list of exempt individuals to the Arizona Department of Economic Security Nutrition Assistance work requirements can be found at the following link:

https://des.az.gov/services/basic-needs/food-assistance/nutrition-assistance/work-requirements-able-bodied-adult

⁷ As noted above, full-time college students will be exempt; for students who are attending school but not full-time, they may combine school hours with other activities to reach the required 20-hour total.

include the following:

- The beneficiary has a disability as defined by the ADA, section 504, or section 1557, and was unable to meet the requirement for reasons related to that disability;
- The beneficiary resides with an immediate family member who has a disability as defined by the ADA, section 504, or section 1557, and was unable to meet the requirement for reasons related to the disability of that family member;
- Illness of a household or family member requiring the care of the beneficiary;
- Illness of the beneficiary;
- Severe inclement weather (including a natural disaster); or
- A family emergency or other life-changing event (e.g., divorce, homelessness, domestic violence, birth or adoption, or death).

In alignment with <u>A.R.S. 36-2903.09</u>, Arizona additionally requests the authority to "allow the [AHCCCS] administration to ban an eligible person from enrollment for one year if it is determined the eligible person knowingly failed to report a change in family income or made a false statement regarding compliance with the requirements of subdivision (<u>a</u>) of this paragraph."

Data Collection

To implement these requirements, AHCCCS will have to modify the data it collects from members as part of its application. AHCCCS is requesting that CMS allow it to require members to provide, as part of the application process, data necessary to determine both compliance with the AHCCCS Works requirements as well as exemptions. This includes, but may not be limited to, whether an individual: is receiving private disability benefits; is a foster parent, victim of domestic violence, or experiencing homelessness; and whether a person has experienced a catastrophic event. It will also include documenting employment search activities. As discussed below, AHCCCS will also want to offer an opportunity for members to demonstrate whether they are medically frail.

Lifetime Limit

Pursuant to A.R.S § 36-2903.09, AHCCCS also requests a five-year maximum lifetime coverage limit for able-bodied adult members who are subject to the above AHCCCS Works requirements and do not fall under one of the exemptions outlined. The five-year maximum lifetime coverage limit would become effective on the date of approval by CMS, and would not include previous times a person received Medicaid benefits. Consistent with the AHCCCS Works requirements, the five-year lifetime limit would only apply to the Group VIII population. For example, if a child was enrolled in AHCCCS for ten years before he or she turned 19, that period would not count toward the lifetime limit. Similarly, the time during which an exemption to the work requirement applied would not count toward the lifetime limit. Finally, consistent with the state statute, the time an individual complied with the work requirement but was still enrolled in AHCCCS would not count toward the lifetime limit.

⁹ That is, the same exemptions that apply to the AHCCCS Works requirement also apply to the five-year lifetime limit.



B. Proposed Cost Sharing Requirements under the Demonstration as Amended.

Cost Sharing Non-Emergency Use of Emergency Department and Ambulance Transport

Pursuant to A.R.S § 36-2903.09, AHCCCS also requests the ability to develop and impose cost-sharing to deter both the non-emergency use of the Emergency Department (ED) and the use of ambulance transport when not medically necessary.

In order to determine whether the use of the above emergency services is necessary, AHCCCS will implement a post-visit medical review that will be applied only to the top 20% of ED utilizers. If it is determined that one of the above services was inappropriately used, AHCCCS will issue three separate warning notifications that will be accompanied by various educational materials and resources. If a beneficiary inappropriately utilizes one of the above services more than three times and three warnings are successfully issued, AHCCCS will impose a Copay in the amount of \$10 for each subsequent inappropriate utilization.

The above cost-sharing will be applied to "able-bodied adult" members who are subject to the above AHCCCS Works requirements and do not fall under one of the exemptions outlined.

C. Proposed Changes to the Delivery System under the Demonstration as Amended.

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

D. Proposed Changes to Benefit Coverage under the Demonstration as Amended.

The benefit coverage for persons impacted by this proposed demonstration amendment will not vary from the State's current program features as described in the current State Plan and Demonstration.

E. Waiver and Expenditure Authorities Necessary to Authorize the Demonstration.

Below is a list of proposed waivers necessary to authorize this demonstration.

Waiver Authority Requested	Requirement	Brief Description
1902(a)(10)(A) and regulations in 42 CFR Part 435 to the extent that those provisions set forth the exclusive list of eligibility requirements.	AHCCCS Works Requirements	To allow the State to require all able-bodied adults to become employed, actively seek employment or attend school or an ESD, and to permit disenrollment and prohibit re-enrollment of individuals who do not meet the requirements.
1902(a)(17) and 42 CFR 435.907 to the extent they restrict the State from requiring beneficiaries to provide information.	AHCCCS Works Requirements and Five-year Lifetime Limit	To allow the State to require members to provide additional information as part of the application process beyond what is required under federal law and to permit the state to deny or discontinue eligibility to persons who do not provide verification

		of compliance.
1902(a)(10)(A) and regulations in and 42 CFR Part 435 to the extent that those provisions set forth the exclusive list of eligibility requirements.	Five-year Lifetime Limit	To allow the State to apply a five-year lifetime coverage limit for Group VIII individuals who do not comply with the work requirements and are not otherwise exempt from those requirements.

AHCCCS is also requesting expenditure authority to claim medical assistance costs under sections 1903(a)(3) and (7) and 42 CFR 433.15 costs associated with the design, development, installation, operation, and administration of systems necessary to implement AHCCCS Works.

F. Implementation of the Demonstration

AHCCCS will begin implementation of the demonstration within one year of CMS approval. However, full implementation will depend upon a number of factors including the requirements ultimately approved and the administrative changes necessary to effectuate the changes.

Administrative Changes

AHCCCS will need to make changes to its systems to collect data that is not currently collected as part of the application process but will be required for implementation. This includes data such as number of hours worked and compliance with the work, educational, or ESD requirements. AHCCCS must also add data fields to capture exemptions. AHCCCS will work with CMS to develop a comprehensive definition of what members would be considered medically frail. This list will include, but is not limited to, members with cancer, HIV/AIDS, chronic substance abuse disorder, hemophilia, and end-stage renal disease (ESRD). Members will be identified through claims and encounter data, which is lagged, as well as a process by which members or providers can notify AHCCCS of the diagnosis to ensure timely application of their exemption.

AHCCCS will also work with the Arizona Department of Economic Security (DES) to leverage its existing workforce development programs. This partnership will require scaling DES programs and systems to accommodate the members who are subject to the work requirement and who take advantage of the opportunity to access the DES programs to gain employment and ESD opportunities. In addition, Arizona will have to electronically capture job search activities. As noted above, AHCCCS is requesting to leverage Medicaid funding for these enhancements rather than building new, Medicaid-funded, systems from the ground up.

Member Communication

Members will be notified of the AHCCCS Works requirements as part of the initial AHCCCS application process, or, for members currently enrolled, their first renewal after implementation. The application will include

¹⁰ Policies around the definition of medically frail would also go through the standard AHCCCS policy development process which includes a 45-day public comment period.



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information about the requirement, what activities qualify toward meeting the requirement, the 6-month grace period to come into compliance, and that the member will be disenrolled for not meeting the requirements after the grace period. It will also include information about changes in circumstances and time frames to come back into compliance. Every renewal notice will also include this information. Suspension notices will include information about how members may be re-enrolled after demonstrating compliance for 30 days.

The State and its contracted managed care organizations will be able to answer member questions regarding these changes and requirements and also coordinate engagement for members found out of compliance.

AHCCCS will also make information publicly available on its website and contracted managed care organizations will include information in member handbooks.

Beneficiary Supports

Arizona will establish and provide beneficiary supports and modifications to help ensure all members subject to the work requirement are able to effectively and meaningfully meet the requirement and stay eligible for Medicaid. This will include providing the public with information and community resources regarding available public transportation, child care support, language support for non-English speaking beneficiaries, and other general community resources to assist individuals with employment. AHCCCS will leverage the Arizona Department of Economic Security (DES) and its contracted managed care organization network to identify and disseminate these relevant resources and tools.

V. Evaluation Design

Research Hypothesis, Goals, and Objectives

The demonstration will test whether authorizing AHCCCS Works requirements and lifetime coverage limits for "able-bodied adults" enrolled in AHCCCS will increase the employment rate for those beneficiaries. The goal is to increase employment opportunities and reduce individual reliance on public assistance. The objectives include increasing the number of beneficiaries with earned income and/or the capacity to earn income, reduce enrollment, and reduce the amount of "churn" (individuals moving on and off assistance repeatedly) as a result of greater access to employment and employer-sponsored health insurance or health insurance through the Federally-Facilitated Marketplace.

Plan for Testing the Hypothesis

AHCCCS is proposing to test a series of hypotheses that will allow the state to: 1) evaluate its success in achieving the overall goals of the demonstration; and 2) identify opportunities for improvement to strengthen the demonstration. The table below outlines the proposed hypotheses for this demonstration and potential performance measures that would allow AHCCCS to effectively test each of the specific hypotheses:

Proposed Hypotheses

Proposed Performance Measure / Approach



The implementation of the AHCCCS Works requirements will increase the rate of "able-bodied adults" who are employed.	The number and percentage of "able-bodied adults" enrolled in AHCCCS who become employed during the demonstration period.
The implementation of the AHCCCS Works requirements will increase the rate of "able-bodied adults" who are actively seeking employment.	The number and percentage of "able-bodied adults" enrolled in AHCCCS that are actively seeking employment during the demonstration period.
The implementation of the AHCCCS Works requirements will increase the rate of "able-bodied adults" who are engaged in training or educational activities.	The number and percentage of "able-bodied adults" enrolled in AHCCCS that are attending school or an Employment Support and Development program, or both, at least twenty hours per week during the demonstration period.
The implementation of the AHCCCS Works requirements will increase the average household income of "able-bodied adults" who are employed.	The average household income of "able-bodied adults" enrolled in AHCCCS over the demonstration period.
The implementation of the AHCCCS Works requirements will result in better health outcomes for those subject to the work requirement vs Medicaid beneficiaries not subject to the requirement.	Data will be drawn from a variety of sources to measure health outcomes including but not limited to claims/encounters, national/regional benchmarks, and interviews and surveys.

VI. Public Process

Pursuant to the terms and conditions that govern Arizona's demonstration, Arizona must provide documentation of its compliance with the 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 demonstration amendment request was posted on the AHCCCS website for public comment on February 18, 2025, at (https://www.azahcccs.gov/Resources/Federal/PendingWaivers/). The web page includes a summary of Arizona's demonstration amendment request, the schedule (dates and times) of public forums across the state and this draft demonstration amendment proposal. In addition to the website posting, AHCCCS uses social media accounts and electronic mail to notify interested parties about Arizona's demonstration amendment proposal.

Stakeholder Meetings

AHCCCS will present the details of Arizona's Demonstration amendment proposal during a hybrid Tribal

Consultation meeting and will conduct three(two virtual and one hybrid) public forum meetings. Details regarding the public forum meetings can be found below:

Public Forum Meeting	Meeting Dates & Times	Meeting Web Link & Call-in Information
Tribal Consultation (Hybrid)	February 4, 2025 8:30 a.m4:30 p.m. AZ Time In-person location: Arizona State Capitol Complex 1700 W. Washington St., Phoenix, AZ 85007	Register in advance for this webinar: https://ahcccs.zoom.us/meeting/register/tZAud-uqpzliGtBPrD_KC6H4x1BseMZfTVEO#/registration Or join by phone (US): 1.669.900.6833 or 1.719.359.4580 or 1.253.205.0468 or 1.253.215.8782 or 1.346.248.7799 or 1.408.638 0968 or 1.669.444.9171 or 1.312.626.6799 or 1.360.209.5623 or 1.360.209.5623 or 1.507.473.4847 or 1.564.217.2000 or 1.646.876.9923 or 1.646.931.3860 or 1.646.931.3860 or 1.301.715.8592 or 1.305.224.1968 or 1.309.205.3325 Meeting ID: 843 0229 9804 Passcode: 002632912
Public Forum #1 (Virtual)	February 27, 2025 1:00 – 3:00 p.m. AZ Time	Register in advance for this webinar: https://ahcccs.zoom.us/webinar/re gister/WN_zeu7wphhQw2L4xbKZJ eKQg#/registration Or join by phone (US): 1.719.359.4580 or 1.253.205.0468 or 1.253.215.8782 or 1.346.248.7799 or 1.408.638.0968 or 1.669.444.9171 or 1.669.900.6833 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 1.305.224.1968 or 1.309.205.3325 or 1.312.626.6799 or 1.360.209.5623 or 1.386.347.5053 Meeting ID: 830 0081 5661 Passcode: 562924019
Public Forum #2 (Hybrid)	March 4, 2025 1:00 – 3:00 p.m. AZ Time In-person location: ADOT Training Facility 1130 N. 22nd Ave., Phoenix, AZ 85009	Register in advance for this webinar: https://ahcccs.zoom.us/webinar/register/WN_IKMwr4EhRxm27Frz0tcOyw#/registration Or join by phone (US): 1.669.900.6833 or 1.719.359.4580 or 1.253.205.0468 or 1.253.215.8782 or 1.346.248.7799 or 1.408.638.0968 or 1.669.444.9171 or 1.646.931.3860 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 1.360.209.5623 or 1.386.347.5053 or 1.507.473.4847 or 1.564.217.2000 or 1.646.876.9923 Meeting ID: 854 0884 1982 Passcode: 663014711
Public Forum #3 (Virtual)	March 13, 2025 11:00 a.m1:00 p.m. AZ Time	Register in advance for this webinar: https://ahcccs.zoom.us/webinar/register/WN_5MyjuuqFQOOCUAmbyuldBA Or join by phone (US):

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1.309.205.3325 or
1.312.626.6799 or
1.360.209.5623 or
1.386.347.5053 or
1.507.473.4847
Meeting ID: 821 0229 8942
Passcode: 617282676

Comments and questions about the proposed 1115 Waiver amendment request can also be submitted by email to: waiverpublicinput@azahcccs.gov or by mail to: AHCCCS, C/O OOD-Division of Public Policy and Strategic Planning; 801 E. Jefferson Street, MD 4200, Phoenix, AZ 85034. All comments must be received by March 20, 2025. 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/).

VII. Budget Neutrality

This proposal will not have a material impact on the state's budget neutrality model for demonstration number 11-W-00275/9.