

November 21, 2018

Scott Cummings
Care1st Health Plan Arizona, A WellCare Company
Plan President/Chief Executive Officer
2355 E. Camelback Rd., Suite 300
Phoenix, AZ 85016

RE: Notice of Concern - Prior Authorization Requirements for Behavioral Health Services

Dear Mr. Cummings:

The Arizona Health Care Cost Containment System (AHCCCS) has identified a number of concerns related to Prior Authorization (PA) requirements Care1st Health Plan Arizona, A WellCare Company (Care1st) has implemented for behavioral health services covered under the AHCCCS Complete Care (ACC) Contract YH19-0001-02.

As a result of these concerns AHCCCS held a meeting with Care1st staff on October 16, 2018 to discuss its PA process and requirements for behavioral health services. Care 1st explained its rationale for PA requirements for several behavioral health services as primarily utilizing PA to more timely understand the needs of members and to provide enhanced care management ultimately looking at utilization of these services overall. Care1st submitted its entire WellCare Health Plans PA grid for behavioral health services on October 19, 2018.

AHCCCS continues to receive concerning member issues related to access to services related to Care 1st PA requirements; as in one case where PA was required for needed behavioral health supports and services for a youth member transitioning to the community from the justice system. Additionally AHCCCS conducted further review of the Wellcare Health Plans PA grid (effective date TBD) for Medicaid with the following findings:

- PA for the following crisis services is required after utilization of a pre identified number of service units
 - H2011 Crisis intervention service
 - S9484 Crisis intervention mental health service, per hour
 - S9485 Crisis intervention mental health service, per diem
 - 90839 Psychotherapy for crisis, first 60 min
 - 90840 crisis code add on for each additional 30 min
- PA is required for behavioral health services such as
 - S5110 Family Support
 - H2017 Psychosocial Rehabilitation Services (Living Skills Training)
 - H2014 Skills Training and Development

In accordance with ACC Contract Paragraph 9 Scope of Services and AHCCCS Medical Policy Manual (AMP) 310-B, PA cannot be required for Crisis services. Care 1st is currently

noncompliant with these Contract and policy requirements and shall **immediately** remove this PA requirement for crisis services including but not limited to those crisis services listed above. In addition, AHCCCS is concerned about the PA requirements for other non-crisis behavioral health services such as those identified above.

Access to timely care and services is a fundamental value and principle of the ACC Contract. AHCCCS expects that PA requirements implemented by the Contractor are compliant with AHCCCS Contract and policy requirements, are not implemented for the primary purpose of utilization management and are not overly burdensome for providers nor hinder access to behavioral health services for members. It is critical that Care 1st understand the landscape of the delivery of behavioral health services in Arizona.

Historically, Arizona's Public Behavioral Health System has pushed for community based behavioral health services to reduce inpatient/institutional level of care utilization, with Arnold v Sarn and JK guiding the way for this system of care approach. The community standard and practice has supported this approach as evidenced by the fact that historically the RBHA system has not required prior authorization for these types of services nor do any of the other ACC plans currently require PA for these types of services. Care1st's approach to PA for behavioral health services is an outlier to the community standard and creates both perceived and real barriers to behavioral health services within Arizona.

Therefore, AHCCCS is requiring the following. Care 1st shall:

- Immediately but no later than **December 1, 2018**, remove the PA requirements for crisis services as outlined above.
- Within 30 days, conduct a comprehensive review of its PA requirements for behavioral health services identifying any services for which PA requirements could be removed.
- Update its PA Grid accordingly.
- Develop and implement a communication plan to ensure providers are notified of all PA changes.

Care1st shall submit the following information to Anzio Dickerson Operations Compliance Officer at Anzio.Dickerson@azahcccs.gov by

COB Monday December 3, 2018

1. An updated PA grid highlighting the changes to crisis services with corresponding effective dates.
2. A communication plan to ensure that providers are notified of the PA changes for crisis services.
3. An explanation regarding the rationale for PA for outpatient services and supports for a member transitioning from the justice system to the community.

COB Monday December 31, 2018

1. Results of the comprehensive review of PA requirements for behavioral health services including strategy and approach of the review process.

2. An updated PA grid highlighting the changes to crisis services with corresponding effective dates for any changes implemented based on the comprehensive review.
3. A communication plan to ensure that providers are notified of any associated PA changes.

It is critically important to the delivery of integrated care and services within Arizona that Care 1st take this opportunity to reevaluate its approach to PA for behavioral health services. AHCCCS will continue to monitor and may provide additional feedback going forward.

In accordance with ACC Contract Section D Paragraph 68, AHCCCS may impose compliance actions up to and including sanctions for noncompliance with Contract and AHCCCS policy requirements.

Should Care1st have any questions regarding this correspondence, please contact me at Virginia.Rountree@azahcccs.gov or (602) 417-4122.

Sincerely,

Virginia Rountree

Virginia Rountree
Assistant Director, DHCM

Cc: Sandra Zebrowski, MD, Care1st
Patty DalSoglio, Care1st
Tom Betlach, AHCCCS
Jami Snyder, AHCCCS
Sara Salek, MD, AHCCCS
Christina Quast, AHCCCS
Brandi Howard, AHCCCS
Michelle Holmes, AHCCCS
Anzio Dickerson, AHCCCS