

October 12, 2016

Eddy Broadway, CEO
Mercy Maricopa Integrated Care
4350 East Cotton Center Blvd., Bldg. D
Phoenix, Arizona 85040

RE: Compliance Action: Corrective Action Plan

Dear Mr. Broadway:

In July 2016, the Arizona Health Care Cost Containment System (AHCCCS) Division of Health Care Management (DHCM) issued Mercy Maricopa Integrated Care (Mercy Maricopa) three annual reports regarding the provision of community services under the Litigation (“Stipulation”) entered into by the parties in *Arnold v. Sarn*. Within the Quality Service Review, Service Capacity Assessment and Year Two Results of the SAMHSA Fidelity Tool Implementation reports, AHCCCS identified both achievements made by Mercy Maricopa that have positively impacted the system, as well as further necessary process improvements. Mercy Maricopa surpassed the capacity requirements related to *Arnold v. Sarn* and the work toward improving services for members during the last three years has resulted in higher fidelity scores, more members housed, more members employed and a robust peer system.

In the spirit of continuous improvement, AHCCCS identified important areas within the three aforementioned reports that require improvements and is requiring Mercy Maricopa to develop a Corrective Action Plan (CAP) to address and resolve those identified issues as follows:

- Individual Service Plans (ISP)
 - The thirty percent (30%) of members who did not have a current assessment/ISP on file
 - The impact of timely access to care when a member is waiting on an ISP, but needs services
 - The need for more frequent ISP updates by staff to better identify member needs
 - Limited recommendations of family support services
- The disproportionate number of members (91%) receiving pre-job training in supported employment, versus services to maintain employment.
- The need for ongoing technical assistance to clinical housing staff regarding permanent supportive housing referrals resulting in successfully housed members.
- The need for ongoing training for clinical staff, specifically ACT team staff, regarding the nature of services domain.
- Analyze the alignment of family service policies with those of CMS, including a plan to demonstrate increased utilization of these services.

In addition to actions identified and implemented to address the above items, the CAP must include the following:

- A detailed description of the performance improvement activities implemented by Mercy Maricopa to address Provider performance including but not limited to the following:
 - Dates for Provider trainings and/or technical assistance

- Action steps for how Mercy Maricopa will hold Providers accountable for noncompliance
- Specific short term and long term strategies that will be implemented to meet these performance improvement activities

Mercy Maricopa must provide a monthly submission to AHCCCS on *Arnold v. Sarn* reporting. The report will be submitted on **15th of each month beginning with November 15, 2016** and can be combined with other existing Arnold deliverables. It must include:

- Status updates regarding performance improvement activities;
- Completed trainings and/ or technical assistance provided; and
- Any corrective actions administered.

AHCCCS will monitor monthly reporting for resolution of issues, compliance with contract requirements as well as ongoing and sustained compliance.

Mercy Maricopa is required to submit the Corrective Action Plan **on or before November 1, 2016** to Kelli Donley at Kelli.Donley@azahcccs.gov with a copy submission to Ena Binns at Ena.Binns@azahcccs.gov. If you have any questions regarding this letter, you may contact Kelli Donley at the above referenced email or 602.364.4651.

Sincerely,

Virginia Rountree

Virginia Rountree
Assistant Director Operations & Clinical
DHCM

Cc:

Paul Galdys, AHCCCS
Kari Price, AHCCCS
Kelli Donley, AHCCCS
Christina Quast, AHCCCS
Ena Binns, AHCCCS
Angelo Edge, Mercy Maricopa
Debra Harris, Mercy Maricopa
Bernadette Moreno, Mercy Maricopa
Carissa Townsend, Mercy Maricopa
Blythe Fitzharris, Mercy Maricopa
Tad Gary, Mercy Maricopa