

September 28, 2022

Lindsey A. Perry Auditor General Office of the Auditor General 2910 North 44th Street, Suite 410 Phoenix, Arizona 85018

Dear Ms. Perry:

Enclosed is the Arizona Health Care Cost Containment System's response to the Auditor General's Performance Audit, detailing its review of selected behavioral health services.

I would like to express my appreciation to the Auditor General's office for its professionalism and collaborative approach throughout the audit process. As noted in the agency's response, AHCCCS has already begun to address the concerns identified.

Sincerely,

Jami Snyder Director

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Finding 1: AHCCCS did not ensure all peer specialists met qualification requirements, and some of these and other peer specialists were not supervised, potentially jeopardizing the quality of peer support services provided to members

Recommendation 1: AHCCCS should ensure that peer specialists meet qualification requirements and are supervised as required by developing and implementing monitoring processes, such as assessing compliance with these requirements during its 3-year reviews of contracted health plans.

<u>Agency response:</u> The finding of the Auditor General is agreed to and the audit recommendation will be implemented.

Response explanation: AHCCCS has implemented policies and procedures to ensure providers comply with the AHCCCS Medical Policy Manual (AMPM 963 and AMPM 965), and the Arizona Department of Health Services' licensure requirements (A.A.C. R9-10). AHCCCS will establish and incorporate standards in the Managed Care Organization (MCO) operational review process to ensure the review of network providers' compliance with employment and supervision expectations for Peer and Recovery Support Specialists (PRSS). AHCCCS will also remind MCOs by written memo of the requirement that providers employing PRSS maintain their own policies detailing Behavioral Health Technician, Behavioral Health Paraprofessional, and Behavioral Health Professional qualifications as well as supervision requirements. This memo will be sent by November 2022.