

MEMBER RESOURCE ON ALTCS HNT & ECR RULEMAKING

Understanding the HNT & ECR Rulemaking Process

What happened, what's changing, and how you can make your voice heard — April 2026.

WHY THIS MATTERS

AHCCCS is required to periodically update its rules and policies to ensure members receive clinically appropriate services and to keep Arizona's Medicaid program sustainable for all who depend on it. This update explains the current rulemaking process for the Home & Community Based Services (HCBS) Needs Tool (HNT) and Extraordinary Care Review (ECR) — and what it means for your family.

BACKGROUND

How Did We Get Here?

- AHCCCS launched a new HCBS Needs Tool (HNT) on **October 1, 2025** — and paused it in mid-October after community concerns.
- Governor Hobbs directed AHCCCS to pause the HNT for children under 18, create an exception process, and revise the tool.
- An **Emergency Rule** took effect October 15, 2025, allowing AHCCCS to revise policies and launch the Extraordinary Care Review (ECR) process.
- Health plans (including DDD) returned to using prior assessment tools while revisions were made.
- AHCCCS held community forums in Oct–Nov 2025 and received over **4,600 public comments** on draft policies.

CURRENT STATUS

What Is Happening Right Now?

AHCCCS is pursuing Regular Rulemaking based on the Emergency Rule. The Emergency Rule will be extended for another 180 days (through October 15, 2026) while the permanent rule is developed.

Nothing changes for members right now. The current assessment tool and service planning process remain in place until policies are finalized.

The Regular Rule will allow AHCCCS to permanently:

- Revise HNT assessment categories and age limits
- Establish the Extraordinary Care Review (ECR) exception process

RULEMAKING PROCESS

How Does Regular Rulemaking Work?

A Regular Rule becomes a permanent part of the Arizona Administrative Code and is reviewed every five years. The process includes:

- 1. Informal Feedback.** AHCCCS collects community input before formal rulemaking begins.
- 2. Economic Impact Study.** Analysis of how the rule affects members, providers, and the state.
- 3. 30-Day Public Comment Period.** Published in the Secretary of State's Register — open to everyone.
- 4. Public Hearing at AHCCCS.** Formal opportunity to provide oral testimony on the Rule.
- 5. GRRC Study Session & Hearing.** Governor's Regulatory Review Council reviews and approves the Rule.
- 6. Secretary of State Approval.** Rule is finalized and codified in the Arizona Administrative Code.

TIMELINE

What Happens & When?

APRIL 2026: Emergency Rule renewed; Regular Rule filed with Secretary of State

APRIL – MAY 2026: 30-day public comment period on the Regular Rule opens

MAY 2026: AHCCCS hosts a public hearing on the Rule

MAY – JUNE 2026: AHCCCS reviews public comments and refines Rule language

JULY – AUGUST 2026: GRRC reviews and formally approves the Rule

AUGUST 2026: Policies finalized; health plans begin readiness work

Early fall 2026: New HNT and ECR policies go live. Families should begin planning now in case service hours change.

KEY POLICY UPDATES

What Is Changing in the HNT?

Based on extensive clinical feedback from developmental pediatricians, OTs, STs, BCBA's, and other clinicians, several age thresholds have been updated:

	EMERGENCY RULE	PROPOSED RULE
Eating / Feeding	Not assessed under age 8	Not assessed under age 5 ✓
Bathing	Not assessed under age 8	Not assessed under age 5 ✓
Dressing	Not assessed under age 7	Not assessed under age 5 ✓
Grooming	Not assessed under age 8	Not assessed under age 5 ✓
Mobility	Not assessed under age 4	Not assessed under age 2 ✓
Transferring	Not assessed under age 4	Not assessed under age 2 ✓
Habilitation (ages 3+)	Tiered caps by age group	Not assessed up to 14 hrs/week ✓
Housekeeping / Laundry / Food Shopping	Not assessed under age 18	No change
Toileting	Not assessed under age 4	No change

New tasks added with no age limitations: Incontinence-Based Laundry and Specialty Supervision.

ECR UPDATE

What's Changing in the ECR?

The Extraordinary Care Review process has no major changes from the Emergency Rule. AHCCCS is making technical clarifications and adding one key requirement: **"Adhere to federal timelines regarding decision making and notification of the outcome to members and families."**

HOW TO ENGAGE

Make Your Voice Heard

- Attend a **Public Forum** — planned for April 10 and April 14, 2026
- Submit written public comment during the 30-day window (April–May 2026)
- Participate in the GRRC Study Session and Hearing
- Email questions or ideas to PPCG@azahcccs.gov

RESOURCES

Find More Information

- **Presentation & recording:** azahcccs.gov → ALTCS Policy Updates
- **Member FAQs:** azahcccs.gov/Members/Downloads/ALTCS_EmergencyRule_PolicyforMinorChildrenFAQ.pdf
- **Member resources:** azahcccs.gov/Members/AlreadyCovered/MemberResources/
- **Email us:** PPCG@azahcccs.gov

Start Planning Now: New HNT and ECR policies are anticipated to be effective in early Fall 2026. Families should use the coming months to work with their case managers or support coordinators on plans in case their child's service hours are adjusted. **Quarterly meetings with case managers are ongoing — please use them to address any concerns and to ensure your child has all the services they need.**

Questions? We're here to help.

AHCCCS is committed to keeping members and families informed throughout this process. Reach out anytime — your input shapes these policies.

CONTACT AHCCCS

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