MEMBER RESOURCE ON ALTCS HNT & ECR IMPLEMENTATION

Understanding the HNT & ECR Implementation Process

What happened, what's changing, and how you can make your voice heard — Updated August 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 status and exempt 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?

- **A state law** signed in April 2025 directed AHCCCS to adopt "a strengthened standardized assessment tool to determine the need for extraordinary care for minor children."
- To comply with this law, on October 1, 2025, **AHCCCS updated its Home and Community Based Services (HCBS) Needs Tool (HNT)**, which assesses the needs of children for both direct care and habilitation services.
- In mid-October 2025, **Governor Hobbs directed AHCCCS to pause** the HNT for children under 18, create an exception process, revise the tool to conform to clinical standards, and proceed to rulemaking.
- AHCCCS did so, and developed the Extraordinary Care Review (ECR) exception process for children with extraordinary needs.
- AHCCCS held community forums in Oct–Nov 2025 and received over **4,600 public comments** on the policies. Families and advocates requested more flexibility in the ECR process.
- AHCCCS **engaged in significant conversations with the Centers for Medicare & Medicaid Services (CMS)** regarding the ECR. CMS ultimately determined that federal law prohibited AHCCCS from building in the additional time and flexibilities requested by families and advocates without formal CMS Waiver authority.
- The formal rulemaking process is long and uncertain. In June 2026, **the Legislature gave AHCCCS authority to finalize these policies through exempt rulemaking** instead of the standard rulemaking process, simplifying a technical process, and allowing AHCCCS to commit to a firm implementation date.

TIMELINE

What Happens & When?

JULY 23, 2026: Revised draft HNT and ECR policies posted to AHCCCS website for additional public comment

JULY 23 – AUGUST 21, 2026: HNT and ECR policies are open for public comment on the AHCCCS website

JULY 24 and AUGUST 12–13, 2026: AHCCCS hosts public forums on the HNT and ECR policies, as revised

AUGUST 25 – SEPTEMBER 2026: AHCCCS reviews public comments and refines exempt rule language

SEPTEMBER 2026: AHCCCS publishes HNT and ECR exempt rules for public comment

SEPTEMBER – NOVEMBER 2026: Policies finalized; health plans begin readiness work

DECEMBER 1, 2026: **HNT and ECR policies go live. Families will be provided additional details in the near future to better understand what may occur if service hours change.**

HOW TO ENGAGE

Make Your Voice Heard

- Attend a **Public Forum** — July 23, and August 12–13, 2026
- Submit written public comment during the 30-day policy window (July 23–August 21, 2026)
- Submit written public comment during the 30-day exempt rulemaking window (mid-September 2026)
- Email questions or ideas to PPCG@azahcccs.gov

KEY POLICY UPDATES

What Is Changing in the HNT?

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

	ORIGINAL POLICY	PROPOSED POLICY
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 under age 3; limited to no more than 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, Specialty Toileting, Specialty Meal Prep, Specialty Eating/Feeding, and Specialty Supervision.

Nothing changes for members right now. The current assessment tool and service planning process remain in place until policies are finalized on December 1, 2026.

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 **December 1, 2026**.

- Updated assessments/planning meetings will occur within 90 days of the policy implementation date, during your regularly scheduled review meeting.
- 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.
- Once the new HNT is in use and the planning meeting has occurred, any service changes (increases or reductions) will go into effect 10 days after completion of the planning meeting, unless an ECR or appeal process is underway.
- If your child experiences a reduction in service hours, your case manager and provider agency will assist you with any needed transitions.

Quarterly meetings with case managers are ongoing — please use them to ask questions and address any concerns.

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:

- **PPCG@azahcccs.gov**
- **azahcccs.gov**