



**Contract Year Ending 2021
Regional Behavioral Health Authority Program
Capitation Rate Notification
American Rescue Plan Act
Home and Community Based Services**

October 1, 2020 through September 30, 2021

**Prepared for:
The Centers for Medicare & Medicaid Services**

**Prepared by:
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Introduction and Limitations

The purpose of this capitation rate notification document is to provide documentation of the data, assumptions, and methodologies used to allocate a delivery system and provider payments initiative (i.e., state directed payment) across the October 1, 2020, through September 30, 2021, (Contract Year Ending 2021 or CYE 21, or alternatively, Federal Fiscal Year 2021 (FFY 21)) capitation rates for the Regional Behavioral Health Authority (RBHA) Program. The American Rescue Plan Act (ARPA) Home and Community Based Services (HCBS) directed payments are payments under 42 CFR § 438.6(c)(1)(iii)(B), as codified in the 2016 Medicaid and Children’s Health Insurance Program (CHIP) Managed Care Final Rule. This capitation rate notification document was prepared for Centers for Medicare & Medicaid Services (CMS), or its actuaries, for review of the ARPA HCBS payments allocation methodology. This capitation rate notification document also provides the CYE 21 RBHA Program capitation rates with and without the ARPA HCBS payments for CMS review. This capitation rate notification document may not be appropriate for any other purpose.

This capitation rate notification document may also be made available publicly on the AHCCCS website or distributed to other parties. If this capitation rate notification document is made available to third parties, then this capitation rate notification document and the original rate certification along with any amendments should be provided in their entirety. Any third party reviewing this capitation rate notification document and capitation rate certifications should be familiar with the AHCCCS Medicaid managed care program, the provisions of 42 CFR Part 438 of 81 FR 27497 applicable to this rate certification, the 2020-2021 Medicaid Managed Care Rate Development Guide (2021 Guide), Actuarial Standards of Practice and generally accepted actuarial principles and practices.

CMS has yet to release a rate development guide for capitation rate updates related to payments under 42 CFR § 438.6(c). In lieu of having an official guide to follow, AHCCCS will follow the 2021 Guide for organizing this capitation rate notification document. The 2021 Guide describes the rate development standards and appropriate documentation to be included within Medicaid managed care rate certifications. In particular, Section I.4.D. covers state directed payments and it is this section that will contain the capitation rate notification documentation. Sections of the 2021 Guide that do not apply will be marked as “Not Applicable” and will be included in this rate notification document for completeness.

Section I Medicaid Managed Care Rates

I.1. General Information

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

I.2. Data

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

I.3. Projected Benefit Costs and Trends

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

I.4. Special Contract Provisions Related to Payment

I.4.A. Incentive Arrangements

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

I.4.B. Withhold Arrangements

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

I.4.C. Risk-Sharing Mechanisms

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

I.4.D. Delivery System and Provider Payment Initiatives

I.4.D.i. Rate Development Standards

This section of the 2021 Guide provides information on delivery system and provider payment initiatives authorized under 42 CFR § 438.6(c).

I.4.D.ii. Appropriate Documentation

The following sections of the 2021 Guide, Section I.4.D.ii.(a)(i) through Section I.4.D.ii.(a)(iii), were provided in an amendment to the CYE 21 RBHA Program Capitation Rate Certification, which was signed by Erica Johnson and Windy Marks on March 14, 2022. These sections are being provided again to facilitate CMS' review, updated as necessary to provide additional information. The original CYE 21 rate certification was signed on November 13, 2020. There was one more amendment to the CYE 21 rate certification which was signed on December 10, 2021, (costs associated with the flu vaccine gift cards to be claimed at 50 percent administrative match). The certified capitation rates shown in Appendix 2 exclude the flu vaccine gift card PMPMs subject to administrative FMAP, consistent with the amendment signed December 10, 2021.

I.4.D.ii.(a) Description of Delivery System and Provider Payment Initiatives

I.4.D.ii.(a)(i) Type and Description of Directed Payment Arrangements

The ARPA HCBS directed payment is designed to provide a uniform percentage increase to eligible AHCCCS providers who provide qualifying HCBS and Behavioral Health Outpatient services (Rehabilitative and Case Management services) to enhance, expand, and strengthen HCBS providers and services. The ARPA HCBS directed payment is intended to focus on providing additional funding to support provider network and staffing capacity.

CYE 21 RBHA Program Capitation Rate Notification – ARPA HCBS

I.4.D.ii.(a)(ii) Directed Payments Incorporated in Capitation Rates

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

I.4.D.ii.(a)(iii) Directed Payments Under Separate Payment Arrangement

The ARPA HCBS payments were not included in the RBHA certified capitation rates and have been paid out via lump sum payments.

I.4.D.ii.(a)(iii)(A) Aggregate Amount

The original estimates of anticipated payments, including premium tax, for the RBHA Program for ARPA HCBS were approximately \$39.24 million. The total payments paid through the RBHA Contractors for the ARPA HCBS were \$38.6 million, inclusive of premium tax.

I.4.D.ii.(a)(iii)(B) Actuarial Certification of the Amount of the Separate Payment Term

The actuaries certified the aggregate directed payment estimates as actuarially sound according to 42 CFR § 438.4 in the rate certification. The estimates were based on projections of future events. This notification document incorporates the actual final aggregate payments by rate cell and the actuaries certify the final payment amounts by rate cell as actuarially sound according to 42 CFR § 438.4.

I.4.D.ii.(a)(iii)(C) Providers Receiving Payment

The qualifying providers receiving the uniform percentage increase include AHCCCS registered providers who provide qualifying HCBS and Behavioral Health Outpatient services (Rehabilitative and Case Management services).

I.4.D.ii.(a)(iii)(D) Distribution Methodology

The distribution methodology for ARPA HCBS is unchanged from the capitation rate certification signed March 14, 2022. The distribution is based on the utilization of services by qualifying providers participating in the ARPA HCBS directed payment. Adjudicated and approved encounter data for the time period October 1, 2020, through March 31, 2021, has been used for the final payments by capitation rate cell. The encounter data used to distribute the final payment amounts included relevant rate cell and program information to determine utilization, and thus distribution into the individual rate cells.

I.4.D.ii.(a)(iii)(E) Estimated Impact by Rate Cell

Appendix 1 shows the total ARPA HCBS dollars paid, including premium tax, by rate cell. Appendix 2 shows the ARPA HCBS payments by rate cell incorporated into the capitation rates as PMPMs. Totals may not add up due to rounding.

I.4.D.ii.(a)(iii)(F) Pre-Print Acknowledgement

These payments are being made under the approved ARPA HCBS 42 CFR § 438.6(c) payment arrangement in a manner consistent with the pre-prints approved by CMS (inclusive of any/all correspondence between the state and CMS regarding the pre-print). The control name for the CYE 21 ARPA HCBS directed payment is AZ_Fee_HCBS.BHO1_New_20201001-20210930.

I.4.D.ii.(a)(iii)(G) Future Documentation Requirements

AHCCCS is submitting this notification document to CMS which incorporates the total amount of the ARPA HCBS payments into the rate certification's rate cells, consistent with the distribution

CYE 21 RBHA Program Capitation Rate Notification – ARPA HCBS

methodology described in Section I.4.D.ii.(a)(iii)(D). The capitation rates with and without the ARPA HCBS payments can be found in Appendix 2.

I.4.E. Pass-Through Payments

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

I.5. Projected Non-Benefit Costs

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

I.6. Risk Adjustment and Acuity Adjustments

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

Section II Medicaid Managed Care Rates with Long-Term Services and Supports

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

Section III New Adult Group Capitation Rates

Not applicable to the ARPA HCBS payments for the CYE 21 RBHA Program rate update.

Appendix 1: CYE 21 ARPA HCBS Payments

GSA	Rate Cell	CYE 21 ARPA HCBS Dollars with Premium Tax
Central	SMI	\$17,974,805
Central	CMDP Child	\$4,872,860
Central	Crisis-only Adult	\$171,581
Central	Crisis-only Child	\$25,567
North	SMI	\$2,230,531
North	CMDP Child	\$1,339,125
North	Crisis-only Adult	\$25,884
North	Crisis-only Child	\$1,754
South	SMI	\$8,304,562
South	CMDP Child	\$3,683,492
South	Crisis-only Adult	\$0
South	Crisis-only Child	\$0
Total		\$38,630,161

Appendix 2: CYE 21 Certified and Adjusted Capitation Rates

		Capitation Rates Effective 10/1/20 - 9/30/21		
GSA	Rate Cell	Cap Rates without ARPA HCBS	ARPA HCBS PMPM	Cap Rates with ARPA HCBS
Central	SMI	\$2,592.18	\$59.06	\$2,651.24
Central	CMDP Child	\$881.38	\$48.22	\$929.59
Central	Crisis Adult	\$13.60	\$0.03	\$13.63
Central	Crisis Child	\$0.83	\$0.00	\$0.84
North	SMI	\$1,606.12	\$28.18	\$1,634.31
North	CMDP Child	\$1,284.11	\$79.39	\$1,363.50
North	Crisis Adult	\$5.68	\$0.01	\$5.70
North	Crisis Child	\$0.71	\$0.00	\$0.71
South	SMI	\$1,640.92	\$45.31	\$1,686.22
South	CMDP Child	\$1,223.88	\$84.05	\$1,307.94
South	Crisis Adult	\$11.59	\$0.00	\$11.59
South	Crisis Child	\$4.18	\$0.00	\$4.18