

**COMMENTS ON PROPOSED COPAY DRAFT SPA**  
**Rec'd as of 11/07/2014**

<b>Item #</b>	<b>Comment From and Date rec'd.</b>	<b>Comment</b>	<b>Analysis/ Recommendation</b>
1.	Katz 9/8/14	Reference to the “new adult group” should always be: “new adult group with income above 106% FPL when they are not in another eligibility group that is exempt from copays.”	This distinction is clear in the SPA chart.
2.	Katz 9/8/14	AHCCCS is not using the new forms CMS has adopted	Template G3 has been added to the DRAFT SPA.
3.	Katz 9/8/14	Include footnotes from the website in the SPA pages	The footnotes have been incorporated to the SPA pages.
4.	Katz 9/8/14	Are there any outpatient surgeries that cost less than \$300.00? If so, amounts should be reflected	The footnotes have been added to the SPA pages. There will be no copays for outpatient surgeries that cost less than \$300.00.
5.	Katz 9/8/14	How will AHCCCS distinguish emergency from non-emergency services? Information should be posted.	Emergency services are defined in federal regulations and the provider will make the determination applying federal law. The template also includes information.
6.	Katz 9/8/14	How will AHCCCS provide notice and referral to beneficiaries who go to the emergency room and are deemed nonemergent? Information should be posted.	Notice and referral to beneficiaries who go to the emergency room and deemed non emergent is the responsibility of the hospital. Under the terms of the provider participation agreement that every hospital is required to sign, they must comply with all federal requirements including the requirement for notice and referral.
7.	Katz 9/8/14	The proposed amendment should explain that if persons are in another population or category exempt from copays they will be exempt from copays. (i.e. pregnant person)	Template G3 has been added to the DRAFT SPA, which includes the population and services exempt from copays under federal regulations.

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8.	Katz 9/8/14	The proposed amendment should explain that if a service is exempt from copays they will not be charged a copay.	Template G3 has been added to the DRAFT SPA, which includes the population and services exempt from copays under federal regulations.
9.	Katz 9/8/14	Concerned about how providers will know which copays apply in which situations.	Information regarding this process is included in the eligibility and enrollment information made available to all providers.
10.	Katz 9/8/14	Concerned about how AHCCCS will inform beneficiaries of their rights concerning copays.	AHCCCS will comply with all of the notice requirements under 42 CFR 447.57
11.	Lundergan 9/24/14	Concerned about the cost of emergency room visits	This comment is outdated and was part of a proposal from the State Legislature. It is not included in the DRAFT SPA.