TO: RBHA CEOs and CMOs

FROM: Cory Nelson
Deputy Director
Margaret McLaughlin
Branch Chief of Compliance

SUBJECT: POLICY CLARIFICATION: Eligibility Screening and Enrollment for AHCCCS and the Federal Health Insurance Marketplace during the Federal Health Insurance Marketplace Open Enrollment Period

DATE: November 3, 2014

This memorandum is intended to clarify the responsibilities of Regional Behavioral Health Authorities (RBHAs) and RBHA providers in meeting the Arizona Department of Health Services/Division of Behavioral Health Services (ADHS/DBHS) expectations regarding requirements in the following ADHS/DBHS policy:


An open enrollment period on the Federal Health Insurance Marketplace for new health care coverage will take place from November 15, 2014 through February 15, 2015. Policy 101, Section 2. Procedures, a. Title XIX/XXI screening and eligibility, describes the process to use in determining a member’s eligibility for Title XIX/XXI or other available programs including Federal Health Insurance.

Policy 101, Eligibility Screening for AHCCCS Health Insurance, Medicare Part D Prescription Drug Coverage and the Low Income Subsidy Program, Section 2. Procedures, a. iv., states that RBHAs and their contracted providers must screen all Non-Title XIX/XXI members upon initial request for services, at least annually after initial screening, when significant changes occur in the member’s financial status, and during each Federal Health Insurance Marketplace open enrollment period. Evidence of screening must be documented in the member’s comprehensive medical record.

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Additionally, *Section 2. Procedures, a. iv. (11)* requires RBHAs to document and report the number of member screenings completed by providers for Title XIX, SMI and Federal Health Insurance Marketplace eligibility. Elements of the screening document, a sample Screening Grid, and dates for required report submissions have been sent to the RBHAs in a separate letter.

RBHAs are expected to ensure that their contracted providers are notified of this open enrollment period and the requirements to screen, document, and track the screenings completed for members.

Questions regarding this clarification may be directed to Bill Eichelberger, Bureau Chief of Policy at (602) 364-4655 or [William.Eichelberger@azdhs.gov](mailto:William.Eichelberger@azdhs.gov).