



ARIZONA
HEALTH CARE COST
CONTAINMENT SYSTEM



DIVISION OF
DEVELOPMENTAL
DISABILITIES

Parents as Paid Caregiver (PPCG) For Minor Children - Policies Public Comment Period

May 2025

Agenda

- Policy Development Process
 - Workgroup
 - Joint Agency Collaboration
- Scope of PPCG Policy Revisions
 - 1115 Waiver Approval Commitments and Conditions
 - HB 2945
 - Other
- Public Comment Response Process
- Implementation Timelines
 - July 1, 2025 Readiness
 - October 1, 2025 Readiness



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Policy Development Process

- Implementation Workgroup
 - Composition included mix of urban, rural and tribal representation
 - Family Members
 - Advocacy Organizations
 - Health Plans/MCOs
 - Case Managers/Support Coordinators and Administrators
 - Providers
 - Served as workgroup to revise policies and forms informed by examples from other states implementing similar models
- AHCCCS and DDD Policy Workgroup
 - Finalized draft proposed policies as a result of workgroup input and feedback
 - Developed process to coordinate public comment period

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Public Comment Process

- Policies are open for public comment
 - AHCCCS (May 9 - July 9)
 - DDD (June 9 - July 9)
- Each agency must follow traditional procedures for posting comments; an [instruction guide](#) has been developed to help streamline the process for stakeholders
- Helpful tips:
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Scope of Proposed Policy Revisions

- 1115 Waiver Approval: Commitments and Conditions approved by CMS on February 16, 2024
 - 1115 Waiver [Proposal](#)
 - 1115 Waiver [Standard Terms and Conditions](#)
- [HB 2945](#) signed into law April 24, 2025



1115 Waiver Approval: Commitments and Conditions

**HB 2945 Requirement*

- Legally responsible parent definition
 - Parents who have formal physical and/or legal custody of their **minor** child including guardians of minor children.
- 40 hour weekly PPCG service model limitation (per child)
 - Common standard term and condition when CMS approves legally responsible persons (parents/spouses) to provide paid care
 - Separate and apart from the service assessment to determine authorized services/hours
 - Not intended to reduce authorized services/hours or to save the state money
- 16 hourly daily (within a 24 hour period) work limitation (per parent)
- Parent may only provide care between 6am and 10pm unless justification is documented*

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1115 Waiver Approval: Commitments and Conditions

**HB 2945 Requirement*

- Person Centered Service Planning
 - Extraordinary Care Test
 - Revisions to the HCBS Needs Tool service needs assessment
 - Care that exceeds the range of activities that a legally responsible parent of a minor child would ordinarily perform in the household on behalf of a minor child, if he/she did not have a disability or chronic illness, and which are necessary to assure the health and welfare of the beneficiary, and avoid institutionalization.
 - Parent cannot bill for services while the child is not present or receiving care in a clinical setting*
 - Parent cannot bill for house cleaning, laundry or meal preparation*
 - PPCG service model option discussion guide and decision roadmap
 - Personal goal related to community integration with peers and fostering relationships

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1115 Waiver Approval: Commitments and Conditions

**HB 2945 Requirement*

- Parents must be employed by a single agency*
- 90-day in-person Support Coordinator visitations and service plan reviews
- Quarterly supervisory visits by service provider agency
 - Caregiver well being assessment and support plan
- Service provider agency workforce planning
 - Member-specific plans that inform the agency's broader workforce development plans
 - Contingency Plans
 - Respite care
 - Identify live-in caregivers in the EVV system*

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Service Assessment vs. 40-Hour Weekly PPCG Service Model Limitation

Service Assessment	40-Hour Weekly PPCG Service Model Limitation
Individualized need based on medical necessity	Standard condition for CMS approvals
Occurs before the decision on who the caregiver is going to be	Occurs after the decision to use the PPCG service model option
Determines amount of authorized services and hours	Addresses who provides the service

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Weekly PPCG Service Model Limit Reminders

- The 40 hour PPCG service model limitation is
 - Per child, **not** per parent
 - Includes both attendant care and habilitation if both are authorized
 - Licensed Health Aides (LHA) services are excluded
 - Separate and apart from the service assessment to determine authorized services/hours
- **IF** a member is authorized for more than 40 hours of care per week and **IF** it was decided the parent will provide the majority of the care, then an alternate caregiver must be utilized to provide any hours over 40 hours in a given week.
- An alternate caregiver may include another non-parent family member (residing inside or outside of the home of the member)

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Other Notable Proposed Policy Revisions

- Comprehensive PCSP only required one time per year, with some exceptions
- Allowance of some quarterly visits to occur virtually, with some exceptions
 - In-person meetings required when the PPCG service model is being utilized
- New requirements for DCW supervisory visits by agencies
- Provider and staff requirements for habilitation services

Policy Outline

Policy	Description
1620-B: Needs Assessment Care Planning Standard	General instructions regarding educating members on the parents as paid caregiver service model option.
1620-D: Placement and Service Planning Standard	Detailed instructions regarding the timing, process and forms to support the discussion and decisions of caregiver options for minors.
1620-E: Service Plan Monitoring and Reassessment Standard	Clarified a comprehensive person-centered service plan is only required on an annual basis with some exceptions related to member preference, transitions and quality of care concerns. Modified requirements for quarterly visitations to allow for virtual and/or visits at a service location with some exceptions related to member preference, connectivity capabilities and quality of care concerns. General instructions regarding educating members on the parents as paid caregiver service model option.

Policy Outline (cont.)

Policy	Description
Exhibit 1620-10: Person Centered Service Plan	Adopted changes to comply with accreditation requirements. Incorporated some prompts to the case manager for the parents as paid caregiver service model option and added a social isolation screening requirement.
Exhibit 1620-11: Social Isolation and Loneliness Screening Tool	Created social isolation screening tool as part of the person-centered service planning process.
Exhibit 1620-17: HCBS Needs Tool and Instructions	Applied an Extraordinary Care standard and incorporated the habilitation service. Created guidance to support the determination of supervision hours.
Exhibit 1620-24: HCBS Scheduling Tool	Created supplemental guidance for the 1620-17 HNT instructions to support assessment of the member's need/availability for service provision.

Policy Outline (cont.)

Policy	Description
1240-A: Direct Care Services	Detailed information on the terms and conditions of the parents as paid caregiver service model option. Revisions to provider supervisory visits requirements. Provisions and clarifications to avoid duplication of services.
Attachment 1240-A: Service Delivery Monitoring and Supervisory Visit Documentation Form	New form to be used by provider agencies to monitor and evaluate the quality of the provision of direct care services through supervision visitations.
1240-E: Habilitation	Detailed information on the terms and conditions of the parents as paid caregiver service model option. New standards for agencies and individuals providing the service. Provisions and clarifications to avoid duplication of services.

Policy Outline (cont.)

Policy	Description
Exhibit 1620-21: Minor Caregiver Options: Discussion Guide and Decision Roadmap	New form to help facilitate a discussion to inform and document the decision on the caregiver option(s) that are in the best interest of the member.
Exhibit 1620-22: Parents as Paid Caregiver Service Model Option Acknowledgement of Understanding	New attestation for parents participating in the service model option.

Implementation Timeline

Task	Start Date	End Date
AHCCCS Public Comment Period	May 9	July 9
DDD Early Notification Period	May 9	July 9
DDD Public Comment Period	June 9	July 9
40-hour weekly PPCG Service Model Limitation and Single Service Provider Agency Requirement in Effect	July 1	N/A
Review of Public Comments	July 10	July 25
Final Versions of Policies Posted	July 28	
Case Manager/Support Coordinator Training on Policies and Tools related to PPCG	July	September
Policy Revision Effective and Implementation Date	October 1	

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Implementation By July 1, 2025

All PPCGs providing care to a member are employed by a single service providing agency, and

All PPCGs providing care under the PPCG Service Model are not exceeding 40 hours in a week or 16 hours in a 24 hour period.

- Providers will receive outreach from health plans to help coordinate transitions.
 - Toolkit for Workforce Development
- PPCGs and members will receive outreach from their Support Coordinator/Case Manager to inform the of both requirements and support transition

Implementation By October 1, 2025

All Support Coordinators/ Case Managers have been trained on the Policies and Tools to implement the PPCG Service Model

All Support Coordinators/ Case Managers will begin implementing policy changes and using the new tools at the member's first planning meeting occurring after October 1, 2025.

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Thank You