

# CHAPTER 3:

## Provider Responsibilities

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Reviewed/Revised: 10/1/18, 11/1/18

### 3.0 AHCCCS PROVIDER REGISTRATION NUMBER

All providers who participate with Steward Health Choice Arizona must register with the Arizona Health Care Cost Containment System (AHCCCS) and obtain a unique provider registration number. For registration or questions, providers may call the AHCCCS Provider Registration Department directly at (480) 417-7670, Option 5 or 1(800) 794-6862, or visit the AHCCCS website at <https://azahcccs.gov/PlansProviders/NewProviders/registration.html>

### 3.1 NATIONAL IDENTIFICATION NUMBER (NPI)

HIPAA requires that all providers use a NPI number as the only provider identifier in electronic transmissions such as claims billing and claims payment. Providers must obtain an NPI and register their NPI with AHCCCS. For information regarding the NPI enrollment, visit the CMS website at <https://nppes.cms.hhs.gov> or call (800) 465-3203.

### 3.2 TAX IDENTIFICATION NUMBER

A provider's tax identification number determines who the payee is and where the payment is sent. It also allows Steward Health Choice Arizona to properly report payment information to the IRS on form 1099- MISC.

### 3.3 FEDERAL EXCLUSION

As a registered provider with the AHCCCS Administration, (Arizona's Medicaid Program), you are obligated under 42 C.F.R. §1001.1901(b), to screen all employees, contractors, and/or subcontractors to determine whether any of them have been excluded from participation in Federal health care programs. You can search the HHS- OIG website, at no cost, by the names of any individuals or entities. The database is called LEIE, and can be accessed at [www.oig.hhs.gov/fraud/exclusions.asp](http://www.oig.hhs.gov/fraud/exclusions.asp), as well, The System for Award Management (SAM) <https://sam.gov/portal/SAM/#1> formerly known as the General Services Administration (GSA) or Excluded Parties List System (EPLS).

### **3.4 STEWARD HEALTH CHOICE ARIZONA CREDENTIALING AND RE-CREDENTIALING**

Steward Health Choice Arizona, in collaboration with several other health plans in Arizona, is an associate of AzAHP Alliance. The purpose of this alliance is to enable providers to complete a credentialing application form one time as the form is interchangeable between plans. Steward Health Choice Arizona works with the Council for Affordable Quality Healthcare (CAQH) where provider information is housed and updated making it accessible for providers.

You can find the provider application on the Steward Health Choice Arizona website at:

[www.StewardHealthChoiceAZ.com](http://www.StewardHealthChoiceAZ.com)

All providers must be credentialed with Steward Health Choice Arizona before a contract can be offered or prior to being added to an existing contract (associates). A provider who has not been credentialed or is not contracted cannot treat Steward Health Choice Arizona members and will not receive payment for services rendered to Steward Health Choice Arizona members. All providers who desire to participate in the Steward Health Choice Arizona provider network are required to meet minimum standards at the time of application and as of the date of the initial credentialing or recredentialing. All provider credentialing verifications are completed and then reviewed by the Credentialing Committee within ninety (90) days of receipt of the completed application. An application is considered to be complete when at least all of the following elements are present:

- A completed, signed, and dated Council for Affordable Quality Healthcare (CAQH) application.
- Current Attestation (not expired)
- Current Certificate of Insurance (COI)
- Current DEA Certification
- 5-Year Work History (If a gap in work history exceeds three months, the provider must explain the gap in writing).

Steward Health Choice Arizona conducts recredentialing at least once every three (3) years. Contracted providers will be notified by the Steward Health Choice Arizona Credentialing Department or a designated entity. Part of the recredentialing process includes a medical records audit which will be conducted by the AzAHP Alliance (Advantmed) anytime during the 3 year period prior to recredentialing. It is important that providers complete the recredentialing application as quickly as possible. Failure to maintain a credentialed status with Steward Health Choice Arizona may result in contract termination and non-payment of claims.

### **3.5 MINIMUM SUBCONTRACT PROVISIONS**

The Minimum Subcontract Provisions (MSPs) are referenced and incorporated into the AHCCCS Provider Participation Agreement as well as AHCCCS Medicaid Contracts, including Intergovernmental Agreements. AHCCCS Contractors' subcontracts must reference and require

compliance with the MSP. Applicable AHCCCS minimum subcontract provisions are located on the AHCCCS website at:

<https://www.azahcccs.gov/PlansProviders/HealthPlans/minimumsubcontractprovisions.html>

### **3.6 CONTRACT RENEWAL /TERMINATION**

Steward Health Choice Arizona provider contracts renew automatically as long as the provider remains at the same location.

Providers who move or leave a contracted group may not be automatically offered a contract in their new location. A contract offer or renewal in such cases is contingent upon network need. Steward Health Choice Arizona routinely reviews its provider network and may make changes based upon network management considerations. Should you plan to leave a contracted group and go out on your own please contact your Provider Performance Representative.

### **3.7 DELEGATION OF PROVIDER FUNCTIONS**

A contracted provider may not delegate any provider function without advance written consent of Steward Health Choice Arizona. Upon receiving consent of Steward Health Choice Arizona, functions further delegated by a provider shall be subject to the terms of the Subcontractor Agreement between Steward Health Choice Arizona and the provider in accordance with the most current applicable AHCCCS and NCQA Standards. Applicable AHCCCS minimum subcontract provisions are located on the AHCCCS website at:

<https://www.azahcccs.gov/PlansProviders/HealthPlans/minimumsubcontractprovisions.html>

Additionally, the AHCCCS Medical Policy Manual (AMPM) is also available via the AHCCCS website at: <https://www.azahcccs.gov/shared/MedicalPolicyManual/>

### **3.8 DELEGATED CREDENTIALING ENTITIES**

Delegated Credentialing Entities agree to comply with all applicable Steward Health Choice Arizona policies and procedures in coordination with respective AHCCCS policies and NCQA Standards. Steward Health Choice Arizona maintains established policies to ensure oversight and monitoring of delegated duties which include, but are not limited to the following:

- Participation in pre-delegated audits to ensure the ability to meet or exceed applicable regulatory standards;
- Participation in Steward Health Choice Arizona initiated audits (at least annually), to ensure compliance with applicable policies and procedures in coordination with respective regulatory requirements; and
- Submit rosters (at least monthly) identifying terminated providers (aka, provider no longer with the delegated entity) and newly added providers.
- Documentation that the following sites have been queried at the time of Credentialing, Recredentialing, and in between Credentialing cycles on a monthly basis for Ongoing Monitoring. Any provider that is found to be on any of the lists below may be terminated

and the identity of the provider must be disclosed to Health Choice Arizona immediately for immediate reporting to AHCCCS/OIG in accordance with the AHCCCS ACOM Policy 103:

- Health and Human Services-Office of Inspector General (HHS-OIG) List of Excluded Individuals/Entities (LEIE) <http://oig.hhs.gov/fraud/exclusions.asp>, and
- The System for Award Management (SAM) <https://sam.gov/portal/SAM/#1> formerly known as the General Services Administration (GSA) or Excluded Parties List System (EPLS).

Current AHCCCS Policies regarding credentialing activities is available via the AHCCCS website in Chapter 950 of the AHCCCS Medical Policy Manual located at:

<https://www.azahcccs.gov/shared/Downloads/MedicalPolicyManual/Chap900.pdf>

### **3.9 CHANGES TO PROVIDER INFORMATION ON FILE**

Providers are required to notify your Provider Performance Representative of any change in practice name, physical address, payee address, tax identification number or NPI. In addition, the provider must register the change with AHCCCS prior to the effective date of change. Changes in your staffing should also be reported to your Steward Health Choice Arizona Provider Performance Representative. If we can provide staff training please contact your Provider Performance Representative.

### **3.10 LICENSURE/CERTIFICATION UPDATES**

Steward Health Choice Arizona requires that providers have current copies of their state license, DEA certificate and Malpractice insurance on file at all times. The Steward Health Choice Arizona Credentialing Department sends letters to providers requesting current copies of these documents when the documents on file have expired. Failure to provide Steward Health Choice Arizona with these documents can result in termination from the network.

### **3.11 CONTINUITY OF CARE/LOSS OF ELIGIBILITY**

Providers terminating their contract without cause are required to continue to treat members until their treatment course is completed. Authorization may be necessary for these services. Members who lose eligibility and continue to have medical needs must be referred to a facility or provider that can provide the needed care at no or low cost. If you identify a member in this circumstance, please contact our Prior Authorization Department for assistance.

### **3.12 APPOINTMENT AVAILABILITY/ APPOINTMENT WAITING TIME**

Steward Health Choice Arizona's contracted PCPs and Specialists must maintain appointment availability within the standards prescribed by AHCCCS (per the AHCCCS Contractor Operations Manual, Chapter 417). Providers are expected to establish a procedure for waiting time so that a member does not wait more than 45 minutes, except in emergency cases or unforeseen circumstances. Steward Health Choice Arizona monitors providers' appointment availability and members' in office waiting time on an on-going basis.

The standards below are applicable to both new and established patients:

Applicable to	Routine	Urgent
PCPs	21 Days	As expeditiously as the member's health condition requires but no later than 2 days of request
Specialists	45 Days	As expeditiously as the member's health condition requires but no later than 2 days of request
Dental Providers	45 Days	As expeditiously as the member's health condition requires but no later than 3 days of request
BH Providers	<b>Initial assessment</b>	<b>Ongoing services</b>
	7 days	23 days non IV drug users
	48 hours for pregnant women with substance use disorders	14 days for IV drug users

Maternity Services	First Trimester	Second Trimester	Third Trimester	High Risk Pregnancy
	Within 14 days of request	Within 7 days of request	Within 3 days of request	Within 3 days of identification of high-risk status or immediately if an emergency exists

**Response for Referrals or Requests for Appointments for Psychotropic Medications**

For eligible members who may need to be seen by a Behavioral Health Medical Practitioner (BHMP), it is required that the person's need for medication be assessed immediately and, if clinically indicated, that the person be scheduled for an appointment within a timeframe that ensures:

- The person does not run out of any needed psychotropic medications; or
- The person is evaluated for the need to start medications to ensure that the person does not experience a decline in his/her behavioral health condition, but no later than 30 days from the identification of need as per [ACOM 417-3 Appointment Availability, Monitoring and Reporting](#).
- WHEN: Have a BHMP assess the urgency of the need immediately. Provide an appointment with a BHMP within a timeframe indicated by clinical need, but no later than 30 days from the identified need.
- WHAT: Screening, consultation, assessment, medication management, medications, and/or lab testing services as appropriate.
- WHO: All Title XIX/XXI eligible persons, all Non-Title XIX/XXI persons enrolled with a T/RBHA, all persons determined to have a Serious Mental Illness and any person in an emergency or crisis.

\*Additional information regarding appointment standards and timeliness requirements for behavioral health services can also be found in Chapter 18 of the Steward Health Choice Arizona Provider Manual, Behavioral Health Services.

### **3.13 NON-EMERGENCY MEDICAL TRANSPORTATION**

In our ongoing efforts to ensure the provision of quality care and services for our members, Steward Health Choice Arizona contracts with Veyo. Veyo is a non-emergency medical transportation company committed to providing quality and timely medical transportation. Members are encouraged and expected to:

Contact their PCP to schedule appointments or seek medical advice.

Arrive and depart no more than an hour before and after scheduled appointment.

Because it is critical for members to be able to reach their physicians, hold times should not exceed 5 minutes. Steward Health Choice Arizona monitors telephone accessibility to ensure that members can reach you to schedule appointments or seek advice.

\*Transportation to behavioral health appointments are coordinated through the member's assigned behavioral health home.

### **3.14 APPOINTMENT AVAILABILITY NON-COMPLIANCE**

In accordance with AHCCCS policy, Steward Health Choice Arizona ensures contracted physicians, ancillary services and facilities are accessible to enrolled members to provide routine and emergent care on a timely basis. Providers will be asked to implement a corrective action plan when appointment availability standards are not met.

Steward Health Choice Arizona monitors the accessibility of contracted providers through:

- Member complaints
- Quality management audits
- Emergency room utilization
- Appointment availability surveys
- Site visits by Steward Health Choice Arizona staff

Failure to comply with the AHCCCS appointment availability standards is viewed as an access to care issue by Steward Health Choice Arizona and may result in a limitation on membership or a reduction in assigned members.

### **3.15 AFTER-HOURS COVERAGE / PHYSICIAN VACATION COVERAGE**

Each provider must have twenty-four (24) hours per day, seven (7) days per week coverage. It is not acceptable to refer Steward Health Choice Arizona members to the emergency room as a means to provide after-hours or vacation coverage. It is the responsibility of the PCP to arrange

after hours care and vacation coverage by a contracted Steward Health Choice Arizona physician.

Acceptable coverage includes the following:

- An answering service that picks up the physician office's telephone after hours. The operator will then contact the physician or his covering physician.
- An answering machine that either directs the caller to the office of the covering physician, or directs the caller to call the physician at another number.
- Call forwarding services that automatically send the call to another number that will reach the physician or his covering physician.

Unacceptable coverage includes the following:

- An answering machine that directs the caller to leave a message (unless the machine will then automatically page the doctor to retrieve the message).
- An answering machine that directs the caller to go to the emergency room, and gives no other option.
- An answering machine that has only a message regarding office hours, etc., without directing the caller appropriately, as outlined above.
- An answering machine that directs callers to page a beeper number.
- No answering machine or service.
- If your answering machine directs callers to a cellular phone, it is not acceptable for charges to be directed to the caller (i.e. members should not receive a telephone bill for contacting the physician in an emergency).

The PCP must notify their Steward Health Choice Arizona Provider Performance Representative of arrangements made for vacation coverage. Notification for vacation coverage includes: expected departure and return dates; name, address and telephone number of covering physician; and if covering physician office will be available to triage and/or answer questions for assigned members.

If the covering physician is unavailable, the PCP should contact their Steward Health Choice Arizona Provider Performance Representative.

Provider Performance Representative will provide names and telephone numbers of physicians who may be able to render same day treatment. Steward Health Choice Arizona will not reimburse physicians who provide coverage for a capitated physician or a fee-for-service physician. Reimbursement of the covering physician is the sole responsibility of the PCP who is absent. Arrangements should be made in advance between the physicians.

### **3.16 DENTAL MISSED APPOINTMENTS**

Steward Health Choice Arizona requires providers to notify us of members who miss their scheduled appointment. Missed appointments should be reported using the Missed Dental

Appointment Form (Exhibit 3.5.2). The Missed Dental Appointment Form should be faxed weekly to Steward Health Choice Arizona at (480) 760-4706. Steward Health Choice Arizona contacts these members to educate them on the importance of keeping scheduled appointments and to provide dental awareness education.

### **3.17 MISSED MEDICAL APPOINTMENTS**

Steward Health Choice Arizona strongly encourages providers to notify us of members who miss their scheduled appointment. Missed appointments should be reported using the Missed Medical Appointment Log (Exhibit 3.5.1). The Missed Medical Appointment Log should be faxed weekly to Health Choice Arizona Member Services at (480) 760-4708 or e-mail to [comments@healthchoiceaz.com](mailto:comments@healthchoiceaz.com). Steward Health Choice Arizona contacts these members to educate them on the importance of keeping scheduled appointments and to discuss any barriers in attending the medical appointment.

Steward Health Choice Arizona also encourages providers to remind members of upcoming appointments as a way to decrease no shows and to contact patients who miss appointments and educate them about the importance of preventive care appointments.

### **3.18 PRIMARY CARE PHYSICIAN**

Steward Health Choice Arizona's Primary Care Physicians (PCPs) and Primary Care Obstetricians (PCOs) perform critical functions for the health plan. Steward Health Choice Arizona relies on you to provide an efficient and effective model of care that assures assigned members receive the medical care and services they require. PCPs are gatekeepers or medical managers and are responsible and accountable for the coordination, supervision, deliverance, and documentation of health care services to assigned members. Capitated providers are required to submit claims regardless of reimbursement.

Steward Health Choice Arizona Quality Management Committee periodically reviews guidelines for PCP management of Steward Health Choice Arizona members.

Steward Health Choice Arizona monitors the over and under-utilization of covered services, in both the inpatient and outpatient settings. This data is used to improve overall performance of the health plan using local and national benchmarks. For example, an average AHCCCS member will seek primary care related services 3.5 times each year. We monitor our PCP's to see if their members are seen more or less frequently and for what reason. That helps Steward Health Choice Arizona predict and arrange for the necessary specialists, ancillary and hospital services they may require.

For guidance as to which specialists/services require Prior Authorization, refer to Chapter 6: Medical Authorizations & Notifications. Specialists are required to submit the appropriate authorization number on their claims.

Steward Health Choice Arizona's contracted specialists work in concert with the member's



Primary Care Physician to coordinate the overall care for the member. Our goal at Steward Health Choice Arizona is to develop partnerships with the specialists in our network.

### **3.19 GENERAL DENTISTS**

Steward Health Choice Arizona relies on its contracted general dentists to provide an efficient and effective model of care that assures members receive the dental care and services they require. The general dentist acts as a gatekeeper and is responsible and accountable for the coordination, supervision, delivery, and documentation of dental health care services to our members.

Steward Health Choice Arizona monitors the over and under- utilization of covered dental services. This data is used to improve overall performance of the Health Plan using local and national benchmarks.

### **3.20 DENTAL SPECIALISTS**

Dental specialists are required to submit the appropriate authorization number on their claims. Steward Health Choice Arizona’s contracted dental specialists work in concert with the members referring dentist to coordinate the overall oral health care for the member.

### **3.21 EPSDT**

The Early Periodic Screening, Diagnostic and Treatment (EPSDT) program is federally mandated and includes all AHCCCS eligible members from birth through age 20. EPSDT includes well child visits and referrals for dental, vision and behavioral health care. Refer to Chapter 16: Women and Children’s Services for complete details. EPSDT Order Form – see Exhibit 3.7

#### **EPSDT TRACKING FORMS**

All EPSDT screening services must be documented on age appropriate, standardized EPSDT tracking forms. All components must be completed and documented. Please indicate that the child is a Steward Health Choice Arizona member by filling in the appropriate box. The EPSDT tracking forms must be returned to Steward Health Choice Arizona. You may batch these forms monthly and return them in bulk to the mailing address below:

Steward Health Choice Arizona  
Attn: EPSDT Coordinator  
410 North 44<sup>th</sup> Street, Suite 900  
Phoenix, AZ 85008

The AHCCCS EPSDT Tracking Forms must be used by providers to document all age- specific, required information related to EPSDT screenings and visits. You can go to the AHCCCS website and download the forms at:

[www.azahcccs.gov/shared/Downloads/MedicalPolicyManual/AppendixB.pdf](http://www.azahcccs.gov/shared/Downloads/MedicalPolicyManual/AppendixB.pdf)

Keep one copy for your medical records and mail in the copy to Steward Health Choice Arizona. Be sure to use the most current EPSDT Tracking Forms with a revision date of April 1, 2014.

All immunizations provided to Steward Health Choice Arizona members are to be documented in the Arizona State Immunization Information System (ASIIS). Access to ASIIS is:

<https://asiis.azdhs.gov/>

**Offices implementing electronic medical records please note:** the EPSDT portion MUST adhere to and contain all of the components found within the AHCCCS EPSDT Tracking Form.

### 3.22 FAMILY PLANNING

Arizona statute requires that AHCCCS members of reproductive age have available Family Planning services. PCPs are responsible for ensuring that members have information and access to these services. Refer to Chapter 16: Women and Children's Services for complete details.

### 3.23 MEMBERS WITH SPECIAL NEEDS

Members with special needs may be characterized as:

1. People who have communication barriers, such as
  - Speak a different language
  - Low literacy
  - Visual or hearing impaired
  - Geographically isolated people
  - Are homeless
2. Those who require health and related services of a type or amount beyond required by people in general as:
  - Common and often mild chronic health issues with unique presentations, for example, allergies, arthritis, and hypertension
  - Complex and manageable health issues, for example, asthma, diabetes, heart failure, or behavioral health conditions
  - Complex and difficult-to-address health issues such as lupus, cerebral palsy, major functional disabilities
  - Adults with Serious Mental Illness
  - Children with Serious Emotional Disturbance
  - People who have substance use disorders
  - Diagnosis specific groups, such as HIV/AIDS cases
  - Physically disabled adults, children and frail elderly
  - Organ transplant recipient or waiting for transplant
3. People whose eligibility status complicates understanding of managed care and enrollment, such as:
  - Dually eligible Medicare/Medicaid members

- Uninsured families and children less familiar with the health system or managed care, who may be eligible under the states' expansion programs

The health care needs of this population often differ from the general population in the type, scope, frequency, coordination and duration of care needed.

Should you have a member with special health care needs, please contact Steward Health Choice Arizona's Case Management Department by calling (800) 322-8670.

Additionally, Steward Health Choice Arizona's actively engages in on-going efforts to identify designated provider locations for accommodating members with physical or cognitive disabilities. If your provider location offers unique features to help accommodate members with various special needs as outlined above, please contact your Provider Performance Representative at (800) 322-8670 so that we can ensure your accommodations are identified in our Provider Directory.

### **3.24 HISTORY AND PHYSICAL**

It is expected that a complete history and physical (for medical providers) will be documented in the member's medical chart. This will be reviewed during medical record audits.

### **3.25 HOSPITAL ADMISSIONS**

Steward Health Choice Arizona uses a fully participatory hospitalists program at most of its network hospitals. The PCP may contact the appropriate Health Choice Arizona contracted hospitalist group to arrange hospitalization or call Steward Health Choice Arizona for assistance. The PCP will continue to manage the patient's care after discharge.

The hospitalist program does not cover pediatric or obstetrical cases. In these situations, as well as those cases where a hospital is not covered under the Health Choice hospitalist program, the PCP or obstetrician should expect to follow the member in the hospital. The PCP or PCO should communicate directly with the Health Choice Prior Authorization Department when a hospital admission is necessary.

**All non-emergent hospital admissions require prior authorization.**

Steward Health Choice Arizona conducts concurrent review of all inpatient admissions. Steward Health Choice Arizona uses accepted nationally recognized criteria when performing concurrent inpatient review. In the event acute inpatient hospitalization services delivered are to evaluate and stabilize an emergency medical condition, concurrent plan notification/authorization is not required for payment of medically necessary, AHCCCS covered services. However, the plan must be notified within 1 calendar day of admission. Steward Health Choice Arizona strongly recommends the facility notifies the plan as quickly as possible to help guarantee full coverage of medical services rendered.

## 3.26 IMMUNIZATIONS

### CHILDREN IMMUNIZATIONS

Age appropriate immunizations are to be provided following the standards adopted by the Center for Disease Control and Prevention's (CDC) Advisory Committee on Immunization Practices, which includes the recommended immunization schedule for persons aged 0 through 18 years approved by the American Academy of Pediatrics (AAP), the American Academy of Family Physicians (AAFP), and the American College of Obstetricians and Gynecologists (ACOG). Those members who are unable to document prior immunization should be immunized until current with their appropriate age group. Arizona law requires that providers report all immunizations administered to children under age 19 to Arizona State Immunization Information System (ASIS).

#### **Providers must participate with the Vaccines for Children (VFC) program to obtain vaccines.**

Failure to maintain current standing as a VFC provider may be grounds for contract termination.

### ADULT IMMUNIZATION

Age appropriate immunizations, when administered, shall be provided following the standards adopted by the CDC's Advisory Committee on Immunization Practices (ACIP), which includes the Adult Immunization Schedule approved by the AAFP, the American College of Physicians (ACP), the ACOG, and the American College of Nurse Midwives.

Providers are strongly encouraged to administer immunizations to adults for influenza and pneumonia when medically indicated and in conjunction with current CDC recommendations.

## 3.27 PATIENT EDUCATION

Steward Health Choice Arizona contracted providers are expected to provide appropriate prevention, health promotion and disease management education. Providers may discuss medically necessary or appropriate treatment options with members even if the options are not covered services. Health maintenance education is not only expected and encouraged it is required. Members should receive counseling about disease prevention and the importance of regular health maintenance visits. Documentation of this counseling must be included in the planning and implementation of the member's care.

It is expected that providers will educate patients about their unique health care needs; share the findings of physical examinations; discuss potential treatment options, side effects and management of symptoms; and, in general recognize that the patient has the right to choose the final course of action among clinically acceptable options.

It is particularly expected that members will be advised about the difference between urgent conditions, such as earaches, or flu, and emergent conditions and be instructed to contact their PCP first before visiting an emergency room or calling an ambulance unless they have a real emergency. Refer to Chapter 5: Quality Management for health education and preventive

services.

### **3.28 PROVIDER'S RIGHT TO ADVOCATE**

It is Steward Health Choice Arizona's position that a provider has rights to advocate on a member's behalf regarding the following:

- The member's health status, medical care or treatment options, including any alternative treatment that may be self-administered
- Any information the member needs in order to decide among all relevant treatment options
- The risks, benefits, and consequences of treatment or non-treatment
- The member's right to participate in decisions regarding his or her health care, including the right to refuse treatment and to express preferences about future treatment decisions.

### **3.29 PRESCRIPTIONS**

Prescriptions should be written to allow generic substitution when available and signature on prescriptions must be legible in order for the prescription to be dispensed. Providers with electronic medical records should prescribe medications electronically.

It is the responsibility of the physician to obtain prior authorization prior to prescribing drugs not on the Steward Health Choice Arizona formulary. For further details, refer to Chapter 17: Pharmacy and Drug Formulary or refer to the Steward Health Choice Arizona web site at [www.stewardhealthchoiceaz.com](http://www.stewardhealthchoiceaz.com).

### **3.30 REFERRALS**

The PCP is responsible for initiating and coordinating referrals to specialists within the Steward Health Choice Arizona network as well as to the Children's Rehabilitative Services (CRS) and the Regional Behavioral Health Authorities (RBHAs) for persons with Serious Mental Illness, and behavioral health providers for people with other behavioral health conditions.

It is critical that a strong communication link be maintained with specialists and/or behavioral health providers who treat your patients. A record of the referral and any treatment notes from the specialists/behavioral health provider must be maintained in the member record.

Steward Health Choice Arizona encourages PCPs to maintain communication with the specialist when referring assigned members for specialty care. Steward Health Choice Arizona has simplified its referral process to make it easier for the PCPs. Specialists are responsible for requesting prior authorization for follow up services and other referrals as necessary.

For a list of services that require authorization, refer to Chapter 6: Authorizations and Notifications.

### **3.31 MEMBER DEATH**

Steward Health Choice Arizona providers are required to notify the Member Services Department of a member's death. Please provide the member's name, member's ID number, date of birth, date and place of death.

### **3.32 DRUG UTILIZATION CONCERNS**

Steward Health Choice Arizona's goal is to provide safe, quality care for assigned members. Providers with concerns about a member's drug utilization should refer the member to Steward Health Choice Arizona's Case Management Department. Steward Health Choice Arizona may identify members as having a potential substance abuse issue through provider information, utilization review, pharmacy reports, or emergency room visits. Steward Health Choice Arizona will contact the PCP when there is a suspected substance abuse problem and assist with coordination of care.

### **3.33 EMERGENCY ROOM**

An "emergency" is medical condition (including emergency labor and delivery) manifesting itself by acute symptoms of sufficient severity (including severe pain) such that the absence of immediate medical attention could result in: a) placing the patient's health in serious jeopardy; b) serious impairment to bodily functions; or c) serious dysfunction of any bodily organ or part.

**\* Providers May Not Refer Members to The Emergency Room Due Solely to Non-Availability of A Same Day Appointment.**

Steward Health Choice Arizona contracts with a number of Urgent Care Centers. Ask your Provider Performance Representative for details and a location near you. All assigned members are considered ACTIVE patients. Every effort should be made to meet the appointment availability standards established by AHCCCS Guidelines: Emergent – same day; Urgent – within 2 days (PCPs) - within 3 days (Specialists/Dentists).

### **3.34 FRAUD, WASTE, AND ABUSE**

#### **DEFICIT REDUCTION ACT/FALSE CLAIMS ACT**

Under the Deficit Reduction Act of 2005 (DRA) (Public Law 109-171 Section 6032) and in coordination with applicable state laws and contractual specifications, Steward Health Choice Arizona is required to ensure that all contracted providers receive training and train their staff on aspects of the Federal False Claims Act provisions.

The goal is to ensure that AHCCCS funds are used effectively, efficiently, and in compliance with applicable state and federal laws and policies. Every dollar lost to the misuse of AHCCCS benefits is one less dollar available to fund programs which provide essential medical

services for Arizona residents.

The Office of the Inspector General audits and investigates providers and members who are suspected of defrauding the AHCCCS program, recovers overpayments, issues administrative sanctions, and refers cases of suspected fraud for criminal prosecution.

As a Medicaid and/or Medicare services provider, it is your responsibility to immediately report matters involving fraud, waste and abuse. Below is the AHCCCS Office of the Inspector General (OIG) website link, which provides training tutorials for providers and the general public that includes (a) administrative remedies for false claims and statements; (b) applicable laws related to civil or criminal penalties for false claims and statements; and (c) whistleblower protections under such laws.

Additional information and education regarding reporting suspected instances of fraud, abuse, or waste are located on the AHCCCS OIG web-page at:

<https://azahcccs.gov/Fraud/ReportFraud/>.

You may also locate compliance resources for physicians on the Federal OIG site at the following links:

- <http://oig.hhs.gov/compliance/physician-education/index.asp>
- Federal OIG Guidance on False Claims Act provisions: [http://oig.hhs.gov/newsroom/video/2011/heat\\_modules.asp](http://oig.hhs.gov/newsroom/video/2011/heat_modules.asp) . (Go to video on False Claims Act).

Steward Health Choice Arizona is committed to detecting, reporting and preventing potential fraud and abuse. Fraud and abuse are defined as:

**Fraud:** Intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes fraud under federal or state law. (Source: 42 CFR 455.2)

**Member Abuse:** Intentional infliction of physical harm, injury caused by negligent acts or omissions, unreasonable confinement, sexual abuse or sexual assault. (Source: 42 CFR 455.2)

**Provider Fraud:** Provider practices that are inconsistent with sound fiscal, business or medical practices, and result in unnecessary cost to the AHCCCS program, or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care.

**Examples of Fraud and Abuse include:**

<u>Falsifying Claim/Encounters</u>	<u>Falsifying Services</u> <ul style="list-style-type: none"><li>○ Billing for</li></ul>	<u>Administrative/Financial</u> <ul style="list-style-type: none"><li>○ Kickbacks</li></ul>
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<ul style="list-style-type: none"> <li>○ Altering a claim Incorrect coding</li> <li>○ Double billing Submitting false data</li> <li>○ Substitution of services</li> </ul>	<ul style="list-style-type: none"> <li>services/supplies not provided</li> <li>○ Misrepresentation of services/supplies</li> </ul>	<ul style="list-style-type: none"> <li>○ Falsifying credentials Fraudulent enrollment practices</li> <li>○ Fraudulent TPL reporting</li> <li>○ Fraudulent recoupment practices</li> </ul>
<p><u>Member Issues (Abuse)</u></p> <ul style="list-style-type: none"> <li>○ Physical abuse Mental abuse</li> <li>○ Emotional abuse Sexual abuse</li> <li>○ Discrimination</li> <li>○ Neglect</li> <li>○ Financial abuse</li> <li>○ Providing substandard care of medical condition</li> </ul>	<p><u>Member Issues (Fraud)</u></p> <ul style="list-style-type: none"> <li>○ Eligibility determination issues Resource misrepresentation (transfer/hiding)</li> <li>○ Residency</li> <li>○ Household composition</li> <li>○ Citizenship status</li> <li>○ Income</li> <li>○ Prescription alteration Misdiagnosis</li> <li>○ Durable medical equipment theft</li> <li>○ Failure to report Third Party Liability</li> </ul>	<p><u>Denial of Services</u></p> <ul style="list-style-type: none"> <li>○ Denying access to medically necessary covered services/benefits</li> <li>○ Limiting access to medically necessary covered services or benefits</li> <li>○ Specialist under-utilization</li> <li>○ Misrepresentation</li> </ul>

**REPORTING FRAUD AND ABUSE (INCLUDING PRESCRIPTION FRAUD)**

Steward Health Choice Arizona encourages providers and provider office staff to report potential fraud and abuse to Steward Health Choice Arizona by contacting their Network Services Representative who will refer the case to the Compliance Department for investigation. You may also feel free to contact the Steward Health Choice Compliance Department directly at:

Steward Health Choice Arizona  
 Attn: Compliance Department  
 410 N. 44<sup>th</sup> Street, Suite 900  
 Phoenix, AZ 85008

Steward Health Choice also provides the internal reporting hotline(s) for Steward Health Choice Arizona and Health Choice Generations.

✓ **1-877-898-6080** (Steward AlertLine - any event for any product)



Although providers and their staff are encouraged to report potential fraud and abuse cases through Steward Health Choice as described above, they may also use one of the following external/confidential hotlines:

*AHCCCS Fraud/Abuse*  
AHCCCS Office of Program Integrity / Mail Drop 4500  
801 E. Jefferson  
Phoenix, AZ 85034  
(602) 417-4193 or  
(800) 654-8713, X 4045

*Prescription Fraud Hotline (Maricopa County)*  
(480) WITNESS or (800) 373-TIPS–All other Counties; Call local law enforcement  
*DHHS/Office of the Inspector General*  
(800)-447-8477

### **3.35 AMERICANS WITH DISABILITIES ACT (ADA) & TITLE VI OF THE CIVIL RIGHTS ACT OF 1964**

Under Title III of the ADA, requirements for public accommodations such as a physician's office mandate that they must be accessible to those with disabilities. Physicians should ensure that their offices are as accessible as possible to persons with disabilities, and should make efforts to provide appropriate accommodations such as large print, materials or easily accessible doorways for those with disabilities. Stewards Health Choice Arizona also offers over the phone interpreter services at no cost to the provider or member.

Under the provisions of Title VI of the Civil Rights Act of 1964, no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

For more information pertaining to available ADA resources offered through Steward Health Choice Arizona, please call your Network Service Representative.

#### Section 1557 of the Patient Protection and Affordable Care Act

Section 1557 is the nondiscrimination provision of the Affordable Care Act (ACA). The law prohibits discrimination on the basis of race, color, national origin, sex, age, or disability in certain health programs or activities, and is intended to advance health equity and reduce health care disparities. Physicians that participate in state Medicaid programs are subject to the provisions of this law.

It is the first federal civil rights law to broadly prohibit discrimination on the basis of sex in federally funded health programs. It also includes important protections for individuals with disabilities and enhances language assistance for people with limited English proficiency.

Providers must comply with the following requirements:

- Post a notice of nondiscrimination and taglines in the top 15 languages spoken by individuals with limited English proficiency.
- Develop and implement a language access plan
- Designate a compliance coordinator and adopt grievance procedures (applicable to group practices with 15 or more employees)
- Submit an assurance of compliance form to Office of Civil Rights at the United States Department of Health and Human Services
- 

For more information regarding the non-discrimination provisions of Section 1557 of the ACA, please see <https://www.hhs.gov/civil-rights/for-individuals/section-1557/index.html>

### **3.36 ADVANCED DIRECTIVES OR END OF LIFE CARE**

Hospitals, nursing facilities, home health agencies, hospice agencies, and organizations responsible for providing personal care must comply with Federal and State law regarding Advance Directives for adult members. These providers are encouraged to provide a copy of the member's executed Advance Directive, or documentation of refusal, to the member's PCP for inclusion in the member's medical record.

Requirements of the Federal and State law include:

- Maintaining written policies that address the rights of adult members to make decisions about medical care, including the right to accept or refuse medical care,
- And the right to execute an advance directive. If the agency/organization has a conscientious objection to carrying out an advance directive, it must be explained in policies. (A health care provider is not prohibited from making such objection when made pursuant to A.R.S. § 36-3205.C.1.)
- Provide written information to adult members regarding each individual's rights under State law to make decisions regarding medical care, and the health care provider's written policies concerning advance directives (including any conscientious objections).
- Documenting in the member's medical record whether or not the adult member has been provided the information and whether an advance directive has been executed.
- Not discriminating against a member because of his or her decision to execute or not execute an advance directive, and not making it a condition for the provision of care.
- Providing education to staff on issues concerning advance directives including notification of direct care providers of services, such as home health care and personal care, of any advanced directives executed by members to whom they are assigned to provide services.
- PCPs that have agreements with any of the aforementioned entities must comply with paragraphs listed above.

End of Life (EOL) Care is a member centered approach with the goal of preserving member rights and maintaining member dignity while receiving any other medically necessary Medicaid covered services.

EOL care includes educating members and families about illness and treatment choices; to keep them healthy; and to afford them greater flexibility in deciding what his or her treatment course will be when faced with life limiting illness regardless of age or stage of the illness. EOL care allows members to receive Advance Care Planning, palliative care, supportive care and hospice services.

### **3.37 MARKETING**

According to the current AHCCCS Health Plan Marketing Policy, Steward Health Choice Arizona must have signed contracts with PCP's, specialists, dentists, and pharmacies in order to be included in marketing outreach programs that target AHCCCS members.

Providers should contact the Steward Health Choice Arizona Marketing Department at [Sierra.Gadberry@steward.org](mailto:Sierra.Gadberry@steward.org) to ensure that any marketing materials that target Steward Health Choice Arizona members are approved by the AHCCCS Division of Health Care Management. Upon receiving the request, Steward Health Choice Arizona will coordinate provider's request with AHCCCS for approval for any marketing materials intended for use by providers.

### **3.38 CORPORATE COMPLIANCE; INTEGRATED HEALTH HOME (IHH), BEHAVIORAL HEALTH HOME (BHH) AND SUB-CONTRACTOR REQUIREMENTS**

Steward Health Choice Arizona requires all Integrated Health Homes (IHHs), Behavioral Health Homes (BHHs) and Sub-Contractors to develop and implement an agency-specific and agency-wide Corporate Compliance Program which shall encompass the Office of the Inspector General's (OIG) Seven Elements of an Effective Compliance Program as follows:

- Policies & Procedures
- Designation of a Compliance Office & Compliance Committee
- Training & Education
- Communication
- Disciplinary Guidelines
- Monitoring & Auditing
- Prompt Response & Corrective Actions

Additionally, all IHHs, BHHs and sub-contractors shall develop and implement an annual Corporate Compliance Plan addressing how fraud and abuse will be prevented and detected. It is further recommended that other providers (who are not IHHs/BHHs) also implement a Corporate Compliance Program and develop a Corporate Compliance Plan. Resources, including evaluation template and training materials are available upon request.

#### **DEFINITIONS**

The following definitions pertaining to this chapter are sources from the Code of Federal Regulations, Title 42, Part 455. Applicable links are provided:

- Fraud means an intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes some fraud under applicable Federal or State law ([42 CFR 455.2](#)).
- Abuse [Program Abuse] means provider practices that are inconsistent with sound fiscal, business or medical practices and result in an unnecessary cost to the Medicaid program, or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care. It also includes recipient practices that result in unnecessary cost to the Medicaid program ([42 CFR 455.2](#)).
- Waste is defined by the Centers for Medicare & Medicaid Services (CMS) as the overutilization of services, or other practices that, directly or indirectly, result in unnecessary costs to the Medicaid and Medicare Program. Waste is general not considered to be caused by criminally negligent actions, but rather the misuse of resources.
- Knowingly or knowingly and willfully means that a person, with respect to information
  - Has actual knowledge of the information;
  - Acts in a deliberate ignorance of the truth or falsity of the information; or
  - Acts in a reckless disregard of the truth or falsity of the information; and
  - Proof of specific intent is not required ([42 CFR 402.3](#)).
- Suspected fraud or abuse is defined as evidence or information that would lead a reasonable person to believe that fraud or abuse is occurring or has occurred. This would normally involve evidence of a material loss or unnecessary expense, a pattern of occurrence and something to show intent to defraud or unsound business practices. An alternate phrase for “suspected fraud or abuse” could be “reasonable belief of fraud or abuse” ([A.R.S. §36-2918.01](#)).

## **PROVIDER CORPORATE COMPLIANCE PLAN AND EVALUATION**

All Steward Health Choice Arizona IHHs, BHHs and sub-contractors are required to implement an agency-specific Corporate Compliance Plan (Plan), updating and evaluating the Plan (at least) annually. All Plans must include the following elements:

- Purpose/Introduction/Overview
- Definitions
- OIG Seven Elements of an Effective Compliance Program:
  - Implementation of written policies, procedures and standards of conduct
  - Designation of a Compliance Officer and Compliance Committee
  - Conducting effective training and education
  - Developing effective lines of communication
  - Enforcing standards through well-publicized disciplinary guidelines
  - Conducting internal monitoring and auditing
  - Responding promptly to detected offenses and developing corrective actions
- Program Goals (for the coming year)
- Plan Addresses/References:
  - False Claims, Correct Coding/Claiming
  - Overpayments (60 day repayments)

- Excluded Providers
- Internal Controls
- Fraud & Abuse Aversion
- Fraud & Abuse Detection
- Fraud & Abuse Investigation
- Fraud & Abuse Prevention
- Fraud & Abuse Reporting
- Reasonable timeframes
- Information from the Evaluation of the prior year Plan should be incorporated into the current year Plan to show continuous improvement of the Corporate Compliance Program
- Signatures (Corporate Compliance Officer, CEO, Board)

#### Annual Evaluation, Timeline & Approval Process

On at least an annual basis, IHHs/BHHs and sub-contractors shall evaluate and report the effectiveness of the previous year's Corporate Compliance Plan, reviewing for up to date information and determining progress on the goals that were outlined for the previous year. The Plan shall be updated accordingly for the upcoming year.

The Plan must be signed by the IHH's/BHH's and sub-contractors Corporate Compliance Office (or individual responsible for Compliance), Chief Executive Office and President of the Board of Directors.

- The PM Form [IHH/BHH Corporate Compliance Plan Evaluation Form](#) (Exhibit 3.38.1) shall be utilized by the IHHs/BHHs and sub-contractors to conduct the annual evaluation of the Plan. The Form must be submitted along with the updated Plan for the upcoming year.
- The final and signed Corporate Compliance Plan and PM Form [IHH/BHH Corporate Compliance Plan Evaluation Form](#) are due to Steward Health Choice Arizona's Corporate Compliance Officer via e-mail by *December 31<sup>st</sup>* each year.
- Steward Health Choice Arizona's Corporate Compliance Officer reviews each PM Form [IHH/BHH Corporate Compliance Plan Evaluation Form](#) of last year's Plan along with the Corporate Compliance Plan for the upcoming year, and expresses approval status (i.e. approved, rejected, or conditional) on the Form. The Form will be utilized to document approval status and any action items necessary to get the Plan approved. Review and approval status will be documented on the Form and sent back to the IHHs/BHHs or sub-contractor.
- IHHs/BHHs and sub-contractors are responsible for implementing the Plan as written, unless Steward Health Choice Arizona's Corporate Compliance Officer agrees to its modification in writing before changes are made.

#### **INTEGRATED HEALTH HOME (IHH), BEHAVIORAL HEALTH HOME (BHH) AND SUB-CONTRACTOR CORPORATE COMPLIANCE OFFICER MEETINGS**

Individuals assigned the responsibility of the IHH/BHH or sub-contractor Corporate Compliance Officer meetings are required to participate in the quarterly Steward Health Choice

Arizona/IHH/BHH/sub-contractor Corporate Compliance Officer Meetings. If the IHH/BHH/sub-contractor Compliance Officer (or individual responsible for compliance) is not available to attend the meeting, notification must be provided to the Steward Health Choice Arizona Corporate Compliance Officer ahead of time, and an alternative representative should participate in their stead.

Attendance at the annual Compliance meeting by the IHH/BHH/sub-contractor Corporate Compliance Officers is preferred in-person; however, Telemedicine or phone technologies will be made available if needed.

IHH/BHH/sub-contractor Corporate Compliance Officers are encouraged to engage in the meetings and contribute to agenda items, meeting discussion and resource sharing.

### **CORPORATE COMPLIANCE TRAINING**

- All Steward Health Choice Arizona IHH/BHH and sub-contractor employees are required to complete Corporate Compliance Training:
  - Within 90 days of hire
  - All employees at least annually thereafter (must be completed no later than February 1<sup>st</sup> each year).

Training for all IHH/BHH employees and subcontractors must include:

- Fraud and abuse detection, prevention, and reporting requirements, in accordance with Provider Manual Section 3.34 Fraud and Program Abuse Reporting.
- All other providers are required to provide Corporate Compliance Training within 90 days of employees' hire date.

Steward Health Choice Arizona will provide the IHHs/BHHs and sub-contractors with a mandatory Essential Learning training each year. For IHHs/BHHs and sub-contractors without access to the E-Learning module, a PowerPoint version of the training will be made available. Annually, the material will be reviewed and updated (if necessary).

IHHs and BHHs will be required to complete and sign a PM Form [IHH/BHH Corporate Compliance Training Certification Form](#) (Exhibit 3.38.2) verifying that all employees and sub-contractors at their agencies have received the training and must submit it to Steward Health Choice Arizona's Corporate Compliance Officer no later than February 1<sup>st</sup> each year.

One-on-one training provided by the Steward Health Choice Arizona Corporate Compliance Officer to any new IHH/BHH Corporate Compliance Officer is mandatory within three months of assignment.

### **Other Providers (Sub-Contractors)**

Within 90 days of hire all employees and sub-contractors must receive training on fraud and abuse requirements and protocols.

Providers must train all employees and sub-contractors in fraud and abuse detection, prevention and reporting requirements, on an annual basis.

Training resources and materials are available to providers upon request.

### **EXCLUDED PROVIDERS**

The 2007 Federal Sentencing Guidelines require organizations to use reasonable efforts not to employ, in positions of substantial authority, any individual the organization knew or should have known through the exercise of due diligence, has engaged in illegal activities or other conduct inconsistent with an effective compliance and ethics program. Ongoing reasonable efforts include but are not limited to:

- Prior to employment, required disclosures, background checks, comparison with federal excluded persons lists and primary source verification of credentials and references;
- During employment, ongoing monitoring;

To ensure that it does not have a prohibited relationship with an individual who is excluded from participating in federal programs in violation of [42 CFR § 438.610](#) and [42 CFR 1001.1901](#), which prohibits health care organizations from knowingly having a relationship with any person or entity that is debarred, suspended or otherwise excluded from participating, organizations are expected to maintain and comply with policies and procedures related to the excluded provider process. These include using government sanctions lists, including the OIG's List of Excluded Individuals/Entities (LEIE), and the System for Awards Management (SAM), including the Excluded Parties Listing System (EPLS) to determine if any of the organization's directors, officers, employees, or contractors who provide items and services that are significant and material to the organization under its contract with Steward Health Choice Arizona appear on any of the exclusion lists.

These reviews are conducted prior to the start of an individual or entity's relationship with the organization, and then regularly on a **monthly basis thereafter**. If any of the individuals appear on any of the exclusion lists the organization will terminate the prohibited relationship.

The organization will notify Steward Health Choice immediately of any confirmed instances of an excluded provider that is or appears to be in a prohibited relationship with the organization or its sub-contractors.

**Integrated Health Homes (IHHs), Behavioral Health Homes (BHHs) and Sub-Contractors – Requirements for conducting Exclusion Checks**

IHHs/BHHs and sub-contractors are required to submit quarterly attestations to the Steward Health Choice Corporate Compliance Officer (and/or Designee) via e-mail, indicating the results of such monthly reviews, including the names (first, middle and last), date of birth, last four digits of the Social Security number, date of hire, current job position at the time of verification, department/specialty, supervisor’s name (first, middle and last) and AHCCCS ID, when applicable and have been run through these databases, the dates of the searches, and the results of the searches. The signed attestations will be due 15 days following the end of each quarter, for the previous reporting period (See Exhibit 3.38.3 – Exclusion Check Attestation). Due dates are:

<b><u>Period</u></b>	<b><u>Due Date</u></b>
January-March	April 15 <sup>th</sup>
April-June	July 15 <sup>th</sup>
July-September	October 15 <sup>th</sup>
October-December	January 15 <sup>th</sup>

Steward Health Choice Arizona e-mail contact(s) notification for submission of IHH/BHH Exclusion Report(s) submissions:

- Nicole Larson, Steward Health Choice Arizona Corporate Compliance Officer ([Nicole.Larson@Steward.org](mailto:Nicole.Larson@Steward.org))
- Mindy Adler, Steward Health Choice Arizona Provider Services ([Melinda.Adler@Steward.org](mailto:Melinda.Adler@Steward.org))

**Note:**

Please ensure exclusion reports are sent via (secure e-mail); and, that submissions are sent to the Steward Health Choice Arizona Corporate Compliance Officer (with a cc: to the point of contact for Providers Services) – as referenced above.

**Other Providers**

Other providers are required to conduct the monthly checks and must maintain those records on-site. Those records must be made available to Steward Health Choice Arizona’s Corporate Compliance Officer upon request, for desk reviews or on-site audits.

For any questions or concerns regarding identified or potential compliance issues, please contact the Steward Health Choice Arizona Corporate Compliance Officer:

**Nicole Larson,**  
**Corporate Compliance Officer**  
**480-760-4902**  
**[Nicole.Larson@Steward.org](mailto:Nicole.Larson@Steward.org)**