



July 24, 2023

AHCCCS
c/o Division of Community Advocacy and Intergovernmental Relations
801 E. Jefferson Street, MD 4200
Phoenix, AZ 85034

RE: **Additional** Public Comment – Arizona Section 1115 Waiver Amendment Request: Parents as Paid Caregivers

Director Carmen Heredia,

Thank you for the opportunity to provide additional comment on the *AHCCCS Arizona Section 1115 Waiver Amendment Request: Parents as Paid Caregivers* proposal dated June 16, 2023.

In addition to our comments submitted on July 17th, 2023, Raising Special Kids would like to offer additional comments concerning the implementation of the proposed amendment. Specifically, we are concerned with the current implementation timeline of November 11, 2023. We believe that ending the current flexibility at this specified time will not provide parents, currently providing care, a sufficient transition period and we urge using a phased approach to unwinding this specific flexibility.

We believe that AHCCCS's multi-pronged approach to address recruitment and retention of DCWs to bolster the workforce to assume the provision of care after the conclusion of the flexibility will ultimately result in more availability of trained providers, however, we do not believe that families will have access to an adequate network of Home and Community-Based Service providers in just a few short months.

Again, we urge AHCCCS to consider a longer runway for implementation of the Parents as Paid Caregiver program and/or a phased approach to unwinding the pandemic-era flexibility currently in place.

A handwritten signature in blue ink, appearing to read "Christopher Tiffany", is placed above the typed name.

Christopher Tiffany
Executive Director

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