

August 18, 2018

Mr. Paul Shannon
Acting Assistant Director, Benefit Services Division
Arizona Department of Administration
100 N 15th Avenue
Phoenix, AZ 85007

Dear Mr. Shannon,

As we turn the corner towards a new plan year for the State of Arizona Health Plan, we write to seek relief from a policy requirement that may be viewed as more onerous to one subset of our newly-hired and continuing faculty and staff.

The ADOA currently requires that a participant enrolling a spouse with a different last name must provide a marriage certificate as documentation. Similarly, a participant seeking to enroll a dependent child in the plan with a different last name must provide a birth certificate, adoption papers, guardianship papers or a marriage certificate that establishes the relationship of a step child.


This policy places more burden on certain groups of eligible faculty and staff. Women are increasingly less likely to change their maiden names when marrying. As a result, our female employees who decide not to take their husbands' last names or who are divorced are more likely to have spouses or dependents with different last names. In addition, our employees from different cultural or ethnic backgrounds may have traditions and even laws regarding last names and thus may be more likely to have spouses or dependents with different last names. For these reasons, we more often require documentation from female employees and from employees from different ethnic and cultural backgrounds.

It seems arbitrary that employees could add any number of "dependents" with the same last name without providing documentary proof of a dependent relationship. For example, we could add nieces and nephews with the same last name without providing a birth certificate. Yet, as noted above, participants adding dependents with different names must provide proof. The lack of information required from employees in the former category would seem to open up the plan to the same perceived level of abuse that is ostensibly prevented by the requirements for the latter group of employees.

It seems to us that expanding the random audits of ALL spouses and dependents of ALL covered participants, regardless of name, gender, social or ethnic background, would be sufficient to ensure that spouses and dependents are legitimately eligible to participate in the plans.

We would like to request a phone call to discuss this in more detail.

Thank you for your consideration.



Kevin Salcido
Vice President of Human Resources
and Chief HR Officer



Judy Cato
Director of Benefits

Office of Human Resources

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