



# Behavioral Healthcare Fraud Update

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*Arizona Attorney General's Office*

*5-14-2026*

# Fraud Targeting Arizona's American Indian Health Plan

- For several years leading up to 2023, criminals executed a **massive fraud scheme targeting Arizona's American Indian Health Plan**, part of the state's Medicaid program.
- Since May 2023, the **Arizona Attorney General's Office Medicaid Fraud Control Unit** has worked tirelessly on countless cases to hold criminals responsible for the harm they caused to vulnerable people in our state and to taxpayers.
- We have pursued criminal enterprises that billed the Arizona Health Care Cost Containment System (AHCCCS) for behavioral health services that were never provided—or were provided under exploitative conditions—**while trafficking Native Americans to unlicensed sober living homes across the Valley.**

Attorney General Mayes  
Announces Grand Jury  
Indictments of 10 Individuals in  
Alleged Patient Brokering  
Scheme

ARIZONA NEWS

**Arizona AG creates \$6M fund to support tribes  
impacted by sober living home fraud scandal**

Nov 19, 2024, 8:00 PM

**Arizona targets phony group homes, accused of  
defrauding millions from Medicaid system**

More than 100 health care providers are under investigation



**Arizona's governor and attorney  
general announce crackdown on  
Medicaid fraud**

**Over 20 more indictments in  
massive Arizona Medicaid fraud  
scheme involving sober living  
homes**

# Conviction of Rita Anagho

- Rita Anagho, a nurse practitioner, **operated TUSA Integrated Clinic** and served as the Behavioral Health Professional for as many as 10 to 15 other behavioral health facilities—many of which have since been suspended or terminated.
- TUSA engaged in a systematic pattern of fraudulent billing, submitting claims for services never provided, including to minor patients, incarcerated individuals, and deceased members, while **specifically targeting the Native American and American Indian population.**
- Anagho's scheme **deprived legitimate Medicaid beneficiaries of critical resources** and, by exploiting an already vulnerable population, **helped fuel Arizona's large-scale behavioral health crisis.**
- In a separate federal case against Anagho, **she was ordered to pay \$55 million in restitution** and is awaiting sentencing in that case. *Ms. Anagho's nursing license was also revoked last year.*

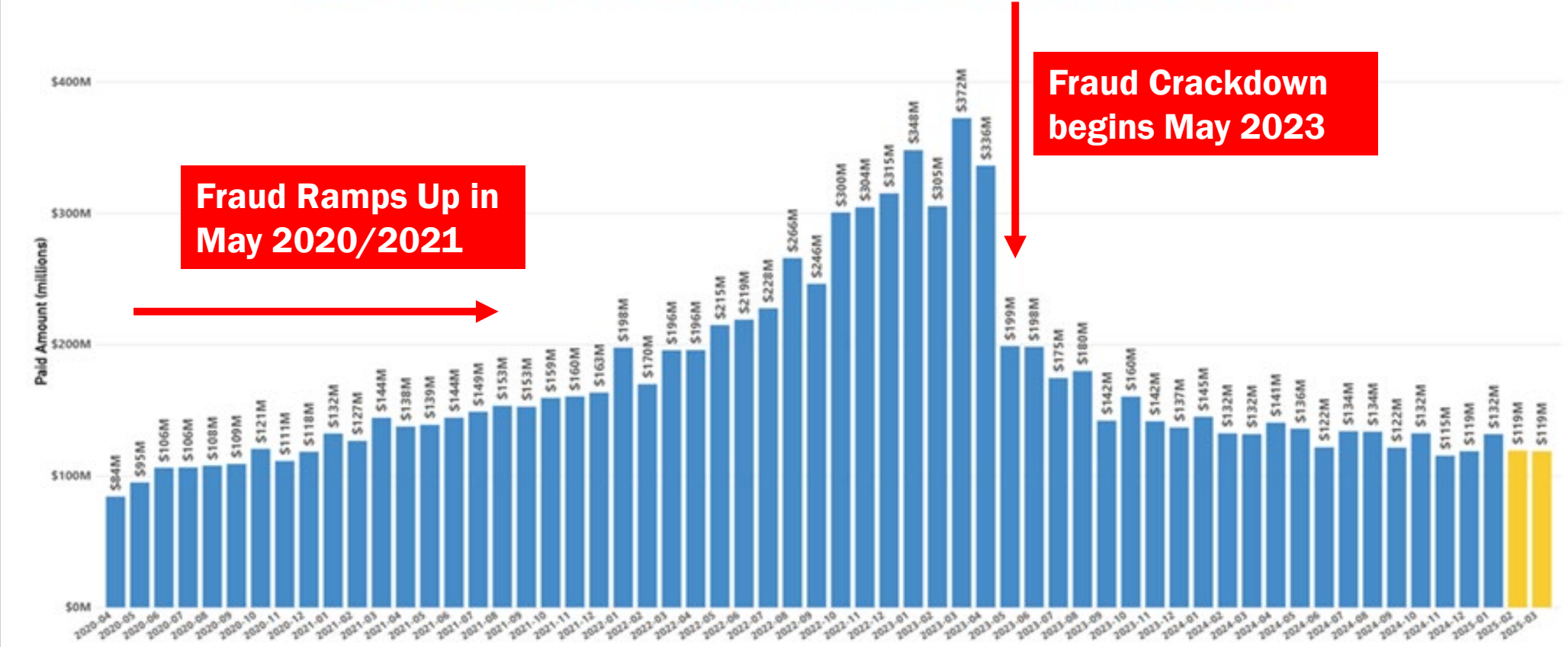


# Fraudulent Billing Enforcement Actions

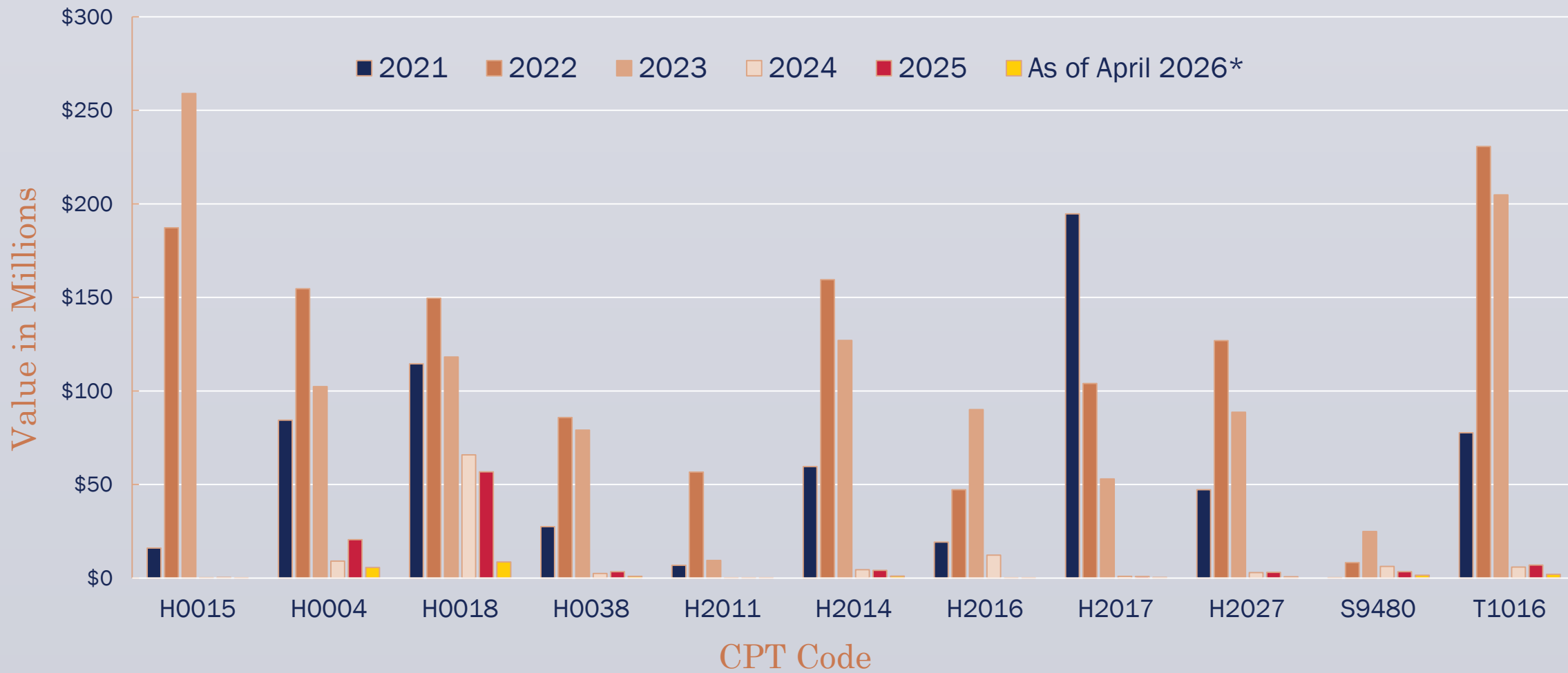
- *From 2021 to 2023, AHCCCS recorded approximately **\$3,114,163,966 in behavioral health code billing** in the American Indian Health Plan.*
- *Since the Attorney General's office launched our aggressive enforcement actions in 2023, that billing has dropped to **approximately \$229,942,919 from 2024 to 2026—a 92% decline.***
- **Since 2023, we have:**
  - *Indicted 140 individuals and entities related to these fraud schemes*
  - *Convicted 41 individuals and/or entities*
  - *Recovered or seized more than \$139 million in cash and real property*
  - *Worked with AHCCCS to put in place guardrails and measures to prevent fraudulent billing*

# Arizona American Indian Health Program (AIHP) Data

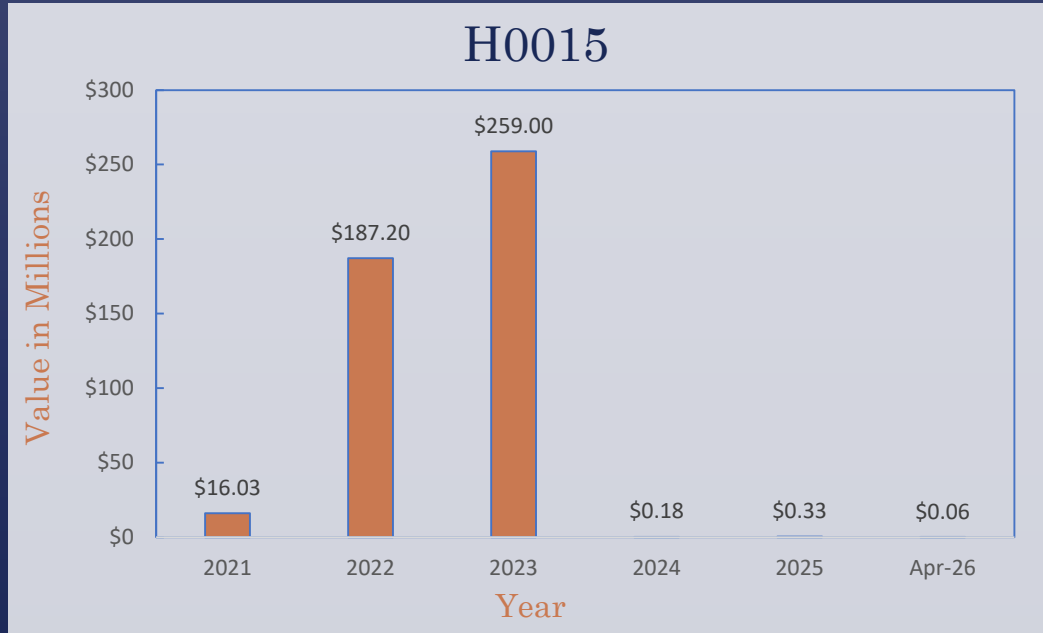
2.1 Utilization by Paid Amount (\$ in Millions) for All Services



## Behavioral Health Treatment Codes - *Cost Analysis Within AIHP by Calendar Year*



ALCOHOL AND/OR DRUG SERVICES; INTENSIVE OUTPATIENT (TREATMENT PROGRAM THAT OPERATES AT LEAST 3 HOURS/DAY AND AT LEAST 3 DAYS/WEEK AND IS BASED ON AN INDIVIDUALIZED TREATMENT PLAN), INCLUDING ASSESSMENT, COUNSELING; CRISIS INTERVENTION, AND ACTIVITY THERAPIES OR EDUCATION



BEHAVIORAL HEALTH COUNSELING AND THERAPY, PER 15 MINUTES (GROUP)



BEHAVIORAL HEALTH; SHORT-TERM RESIDENTIAL (NON-HOSPITAL RESIDENTIAL TREATMENT PROGRAM), WITHOUT ROOM AND BOARD, PER DIEM

SELF-HELP/PEER SERVICES, PER 15 MINUTES



CRISIS INTERVENTION SERVICE, PER 15 MINUTES



SKILLS TRAINING AND DEVELOPMENT, PER 15 MINUTES



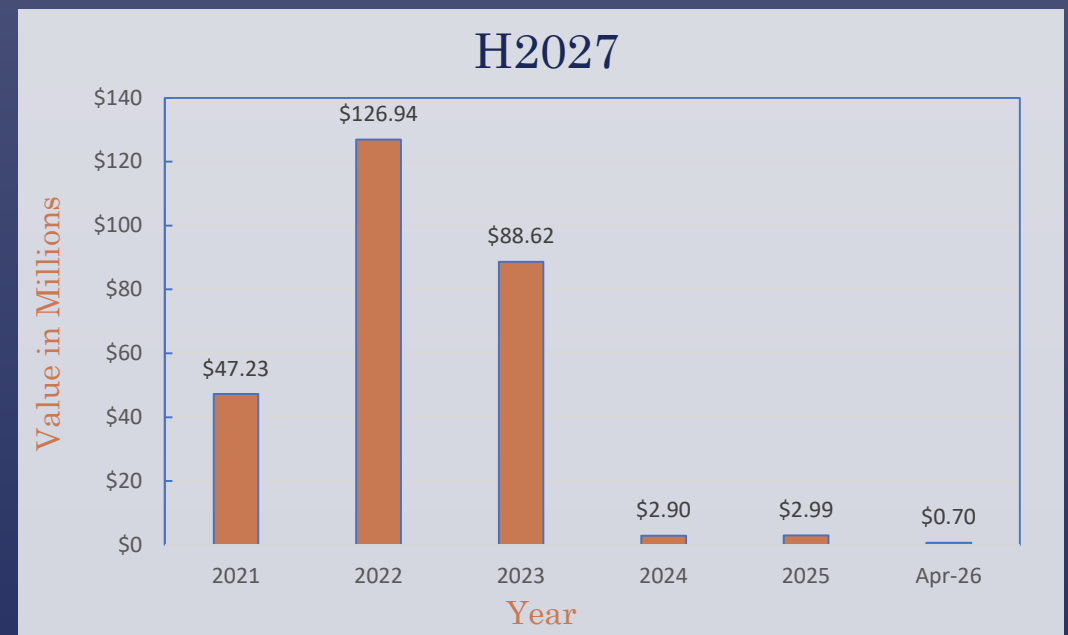
COMPREHENSIVE COMMUNITY SUPPORT SERVICES, PER DIEM



PSYCHOSOCIAL REHABILITATION SERVICES, PER 15 MINUTES



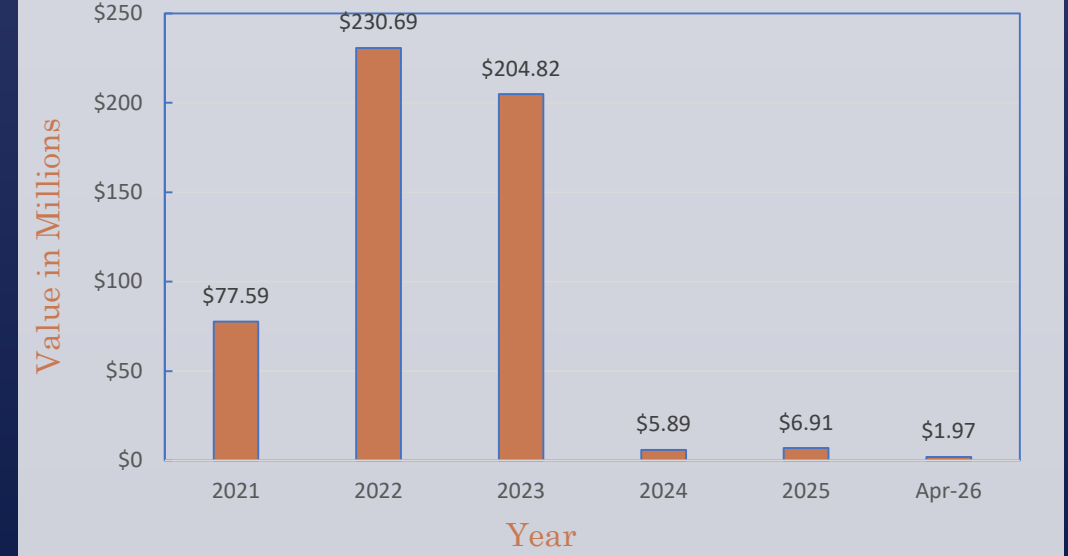
PSYCHOEDUCATIONAL SERVICE, PER 15 MINUTES



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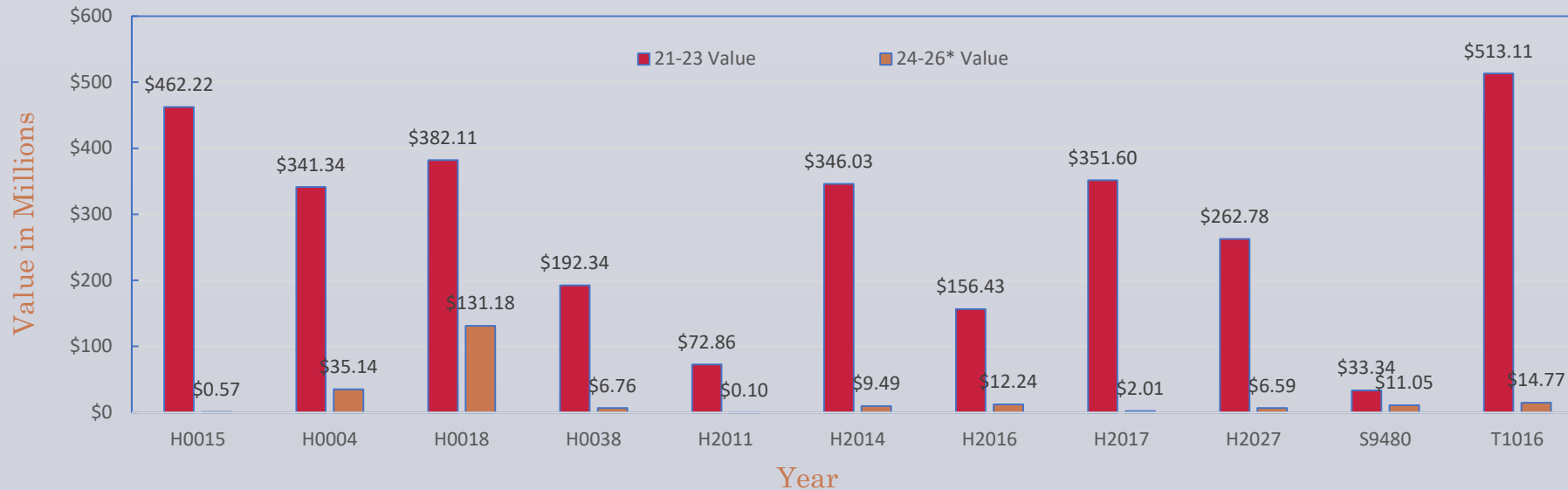
CRISIS INTERVENTION MENTAL HEALTH SERVICES, PER HOUR

CASE MANAGEMENT, EACH 15 MINUTES

## All CPT Codes Combined



## All CPT Codes – 21-23 Compared to 24-26





**Arizona Attorney General's Office Health  
Care Fraud Unit Earns National Award for  
Excellence in Fighting Fraud and Abuse**

“For the past three years, my office has made it a top priority to hunt down and prosecute the criminals who stole from Arizona's Medicaid program while exploiting some of our most vulnerable residents. And billing to the programs targeted in this scheme has dropped by an astonishing 92% since we launched our fraud crackdown. *We are not done. We will continue to pursue individuals and entity that participated in this fraud.*”





Thank You