

December 3, 2024

Administrator Chiquita Brooks-LaSure
U.S. Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

RE: AHCCCS Former Foster Youth - Eligibility and Enrollment Amendment Request

Dear Administrator Brooks-LaSure,

On behalf of the State of Arizona and the Arizona Health Care Cost Containment System (AHCCCS), I am pleased to submit the enclosed application for Arizona's Former Foster Youth Eligibility and Enrollment demonstration waiver proposal under Section 1115 of the Social Security Act. Arizona's current 1115 waiver is in place through September 30, 2027, and if approved, this amendment will run concurrently with AHCCCS' requested renewal period through September 30, 2027.

Arizona has long demonstrated its commitment to innovation in Medicaid. Building on that history and experience, the Former Foster Youth Eligibility and Enrollment Amendment is designed to complement the existing transitional medical care for children leaving foster care by promoting continuity of care and coverage while also simplifying the administrative processes and reducing unnecessary eligibility churn. In combination with Arizona's approved 1115 waiver programming, this amendment will help address the higher risk of multiple chronic health conditions and health related social needs (HRSN) experienced by foster youth and former foster youth, including but not limited to an increased prevalence of physical and behavioral health needs and higher rates of homelessness.

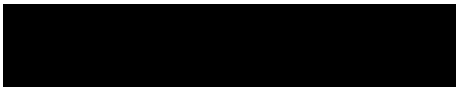
The first and second requests of this waiver application are in alignment with House Bill 2622 passed by Arizona's 55th Legislature. Subject to approval from CMS, the AHCCCS administration is required to annually renew the eligibility of an individual who was in the custody of the Arizona Department of Child Safety (DCS) when the individual reached 18 years of age without requiring additional information from the individual until the individual reaches 26 years of age, unless the individual notifies AHCCCS that the individual moved out of Arizona or has provided information indicating that the individual may qualify for a different eligibility category.

The third request is in response to Section 1002(a) of the SUPPORT Act which created a Former Foster Care Children (FFCC) Medicaid state plan eligibility group, providing coverage for individuals who were receiving Medicaid while in foster care under the responsibility of any state. However, the SUPPORT Act requirements apply exclusively to individuals who turn 18 on or after January 1, 2023. As a result, Arizona requests section 1115 demonstration authority to continue coverage for individuals who turned 18 years old on or before December 31, 2022, until a beneficiary reaches age 26.

The initiatives proposed in this waiver request were informed by a robust public input process. AHCCCS engaged with various stakeholders during the public notice process, obtaining input from the State Medicaid Advisory Committee, community members participating in two virtual public forums, and tribal representatives during Tribal Consultation sessions. In addition, we received written responses, offering overwhelming support for the Former Foster Youth Eligibility and Enrollment Amendment and the strategies detailed in the waiver proposal.

Thank you again for your consideration of the Former Foster Youth Eligibility and Enrollment waiver request. We appreciate your shared commitment to the innovations advanced in the proposal and your recognition of the impact that continuity of care can have on the health and wellness of those served by AHCCCS.

Sincerely,

A solid black rectangular box used to redact the signature of Carmen Heredia.

Carmen Heredia
Director

December 2024

Former Foster Youth- Eligibility and Enrollment

Table of Contents

I. SUMMARY	2
II. OVERVIEW	3
III. WAIVER AMENDMENT PROPOSAL DETAILS	4
IV. WAIVER AND EXPENDITURE AUTHORITIES NECESSARY TO AUTHORIZE THE DEMONSTRATION	5
V. EVALUATION DESIGN	5
VI. PUBLIC NOTICE PROCESS	6
VII. Public Comment Summary	7
VIII. BUDGET NEUTRALITY	8

Former Foster Youth- Eligibility and Enrollment

I. SUMMARY

The Arizona Health Care Cost Containment System (AHCCCS) is requesting an amendment to the 1115 Research and Demonstration Waiver, Project Number 11-W-00275/9, to seek authority to:

1. Waive the condition of eligibility in 42 CFR 435.608 requiring Medicaid beneficiaries to apply for other cash benefits for the Former Foster Youth (FFY) population.
2. Relieve individuals who meet the statutory definition at 1902(a)(10)(A)(i)(IX) of the obligation to provide information about potentially liable third parties at renewal as a condition of eligibility.
3. Extend eligibility for Medicaid state plan benefits to FFY who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care and are now applying for Medicaid in Arizona.

AHCCCS currently offers transitional medical care for children leaving foster care that are between the ages 18 to 26. AHCCCS refers to this group as the Young Adult Transitional Insurance (YATI) population. For those who qualify, there are no monthly premiums.

The goal of the Former Foster Youth- Eligibility and Enrollment amendment is to:

- Promote continuity of care and coverage,
- Move toward administrative simplification,
- Reduce health disparities for the target population, and
- Reduce unnecessary eligibility churn.

The first and second requests, submitted to CMS in March of 2023, are in alignment with House Bill 2622 passed by Arizona's 55th Legislature. Subject to approval from CMS, the AHCCCS administration is required to annually renew the eligibility of an individual who was in the custody of the Arizona Department of Child Safety (DCS) when the individual reached 18 years of age without requiring additional information from the individual until the individual reaches 26 years of age, unless the individual notifies AHCCCS that the individual moved out of Arizona or has provided information indicating that the individual may qualify for a different eligibility category.

The third new request is in response to Section 1002(a) of the SUPPORT Act which created a Former Foster Care Children (FFCC) Medicaid state plan eligibility group, providing coverage for individuals who were receiving Medicaid while in foster care under the responsibility of any state. However, the SUPPORT Act requirements apply exclusively to individuals who turn 18 on or after January 1, 2023. As a result, Arizona requests section 1115 demonstration authority to continue coverage for individuals who turned 18 years old on or before December 31, 2022, until a beneficiary reaches age 26.

The State requests that expenditures for service provision to the YATI population including the waiver from 42 CFR 435.608 as described above be regarded as expenditures under the State's Medicaid Title XIX State Plan.

Former Foster Youth- Eligibility and Enrollment

II. OVERVIEW

AHCCCS is seeking a five-year Medicaid Section 1115 Research and Demonstration Waiver that promotes continuity of care, administrative simplification, and reduces unnecessary eligibility churn. The demonstration is designed to provide quality healthcare and improve health outcomes through continuity of care for the Former Foster Youth Population, while reducing administrative burdens.

Foster youth and former foster youth have a higher risk of experiencing multiple chronic health conditions and health related social needs (HRSN), beyond what is associated with socioeconomic instability, including:

Increased prevalence of physical and behavioral health needs¹:

- Foster youth frequently experience adverse childhood experiences – such as abuse, neglect, domestic violence, and parental substance abuse – that increase the risk of serious health problems later in life, including:
 - Severe obesity, diabetes, heart disease, cancer, stroke, chronic obstructive pulmonary disease (COPD), and broken bones.
- Former Foster Youth are twice as likely to experience PTSD compared to Iraq combat veterans.
- Former Foster Youth are twice as likely to experience depression compared to the general population.
- Former Foster Youth are more likely to suffer from anxiety and attempt suicide.

Higher rates of homelessness²:

- Youths aging out of foster care are at high risk of becoming homeless during the transition to adulthood. One in five reports being homeless between ages 17 and 19, and over one in four (29%) report being home-less from 19 to 21. Among Amer-i-can Indi-an young adults, the fig-ure jumps to almost half (43%) for ages 19 to 21. Furthermore, homelessness becomes a huge contributing factor to returned mail and failure to comply with the procedural requirements for continued eligibility³.

Further, quality health care through easier to access Medicaid coverage is a critical driver of health and health outcomes for low income adults with chronic conditions⁴, and former foster youth show an even higher reliance on public insurance coverage options than the general population⁵:

¹ Sources: <https://www.medicaid.gov/state-resource-center/mac-learning-collaboratives/downloads/foster-care-ensuring-coverage-continuity.pdf>

²<https://www.aecf.org/blog/child-welfare-and-foster-care-statistics>

Häggman-Laitila, A., Salohekkilä, P. & Karki, S. Young People's Preparedness for Adult Life and Coping After Foster Care: A Systematic Review of Perceptions and Experiences in the Transition Period. Child Youth Care Forum 48, 633–661 (2019). <https://doi.org/10.1007/s10566-019-09499-4>

³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5644395/>

⁴ Winkleman, T and V. Chang. 2018. "Medicaid Expansion, Mental Health, and Access to Care"

⁵ <https://www.communitycatalyst.org/resources/publications/document/Foster-Youth-final-1.pdf?1401306962>;

<https://www.ncbi.nlm.nih.gov/pubmed/26474668>;

<http://pediatrics.aappublications.org/content/pediatrics/134/6/1067.full.pdf>;<https://www.ncbi.nlm.nih.gov/pmc/article>

Former Foster Youth- Eligibility and Enrollment

- Medicaid coverage rates among one cohort surveyed in 2014 and 2016 (after the creation of the former foster youth group):
 - 89% of 19-year-olds in foster care have Medicaid coverage, and
 - 69% of 19-year-olds no longer in foster care have Medicaid coverage.

Considering this population's higher reliance on public insurance options such as Medicaid, former foster youth experience known barriers to Medicaid coverage, including:⁶:

- Former foster youth can be a hard-to-reach population, the effects of which can be compounded by state systems/operations that do not ensure continuity of coverage for youth leaving foster care or facilitate streamlined re-enrollment.

III. WAIVER AMENDMENT PROPOSAL DETAILS

A. Proposed Cost Sharing Requirements under the Demonstration as Amended:

This demonstration does not change the Medicaid benefit package design; there is no new cost-sharing, copayments, or coinsurance for any benefit provided under the waiver. State Plan benefits will continue to be applied in accordance with the State Plan and all eligibility groups will continue to receive all State Plan benefits.

B. Proposed Changes to the Delivery System under the Demonstration as Amended:

The delivery system for persons impacted by this proposed 1115 Waiver amendment will not vary from AHCCCS' current program features as described in the current State Plan and demonstration.

C. Proposed Changes to Benefit Coverage under the Demonstration as Amended:

This demonstration does not change the Medicaid benefit package design; there are no new or fewer services, cost-sharing, copayments, or coinsurance for any benefit provided under the waiver. State Plan benefits will continue to be applied in accordance with the State Plan and all eligibility groups will continue to receive all State Plan benefits.

D. Proposed Changes to Eligibility Requirements.

For individuals determined to meet the Former Foster Youth criteria at Social Security Act Section 1902(a)(10)(A)(i)(IX), annually renew eligibility on an automatic basis without requiring additional information from the person until the person reaches twenty-six years of age, unless:

1. The person notifies the administration that they may qualify for a different eligibility category,
2. The Agency or its designee receives information from the person or a reliable electronic data match that the person is no longer an Arizona resident, or
3. The individual withdraws the enrollment voluntarily or is deceased.

Extend eligibility for Medicaid state plan benefits to FFY who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of

es/PMC4617302

⁶<https://www.medicaid.gov/state-resource-center/mac-learning-collaboratives/downloads/foster-care-ensuring-coverage-continuity.pdf>

Former Foster Youth- Eligibility and Enrollment

attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona.

IV. WAIVER AND EXPENDITURE AUTHORITIES NECESSARY TO AUTHORIZE THE DEMONSTRATION

REQUESTED WAIVER & EXPENDITURE AUTHORITIES

Application for other benefits

(42 CFR 435.608)

To the extent necessary to relieve individuals who meet the statutory definition at 1902(a)(10)(A)(i)(IX) of the obligation to apply for other cash benefits at renewal as a condition of eligibility.

Cooperation to assist in pursuing third parties who may be liable to pay

(42 CFR 433.147)

To the extent necessary to relieve individuals who meet the statutory definition at 1902(a)(10)(A)(i)(IX) of the obligation to provide information about potentially liable third parties at renewal as a condition of eligibility.

Former foster care children

(42 CFR 435.150)

To waive the limitation on former foster care children eligibility established at 42 CFR 435.150, as a result of changes implemented under Section 1002(a) of the SUPPORT Act, which created a Former Foster Care Children (FFCC) Medicaid state plan eligibility group, providing coverage for individuals who were receiving Medicaid while in foster care under the responsibility of any state. The SUPPORT Act requirements apply exclusively to individuals who turn 18 on or after January 1, 2023. AHCCCS seeks to extend eligibility for full Medicaid state plan benefits to FFY who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona.

Former foster care children

Expenditures for former foster care children who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona.

V. EVALUATION DESIGN

Arizona's 1115 Waiver Evaluation design for Project Number 11-W-00275/9, will be modified to incorporate the Former Foster Youth- Eligibility and Enrollment waiver amendment. The demonstration will test whether this demonstration, if approved, effectively promotes continuity of care, simplifies administrative burden, and reduces unnecessary churn of individuals' eligibility to access Medicaid covered services. In addition, the demonstration will be tested to assess the provision of quality health care and improvement in health outcomes through continuity of care to the Former Foster Youth Population.

Former Foster Youth- Eligibility and Enrollment

Objectives	Proposed Hypotheses	Potential Approaches
The AHCCCS Former Foster Youth- Eligibility and Enrollment demonstration will promote continuity of care, simplify administrative burden and reduce unnecessary churn of individuals' eligibility to access Medicaid Services	The AHCCCS Former Foster Youth- Eligibility and Enrollment demonstration will maintain or improve health outcomes for AHCCCS members.	Data will be drawn from a variety of sources including, but not limited to: Member surveys, State eligibility and enrollment data, Claims/encounter data, Administrative program data (PMMIS), T-MSIS, National/regional benchmarks, and Key informant interviews and focus groups.
	The AHCCCS Former Foster Youth- Eligibility and Enrollment demonstration will maintain or improve the management of chronic conditions for AHCCCS members.	
	The AHCCCS Former Foster Youth- Eligibility and Enrollment demonstration will maintain or improve access to care for AHCCCS members	
	The AHCCCS Former Foster Youth- Eligibility and Enrollment demonstration will maintain or increase utilization of primary care and preventative health services.	
	The AHCCCS Former Foster Youth-Eligibility and Enrollment demonstration will maintain or improve member satisfaction with care.	
	The AHCCCS Former Foster Youth- Eligibility and Enrollment demonstration will promote continuity of care for its members.	
	The AHCCCS Former Foster Youth- Eligibility and Enrollment demonstration will yield cost-effective care for AHCCCS members.	

VI. PUBLIC NOTICE PROCESS

Pursuant to the terms and conditions that govern Arizona's demonstration, Arizona must provide documentation of its compliance with Demonstration of Public Notice process (42 CFR 431.408), the tribal consultation requirements pursuant to Section 1902(a)(73) of the Act as amended by Section 5006(e) of the American Recovery and Reinvestment Act of 2009, and the tribal consultation requirements outlined in STC 13.

Former Foster Youth- Eligibility and Enrollment

Public Website

The demonstration amendment request was posted on the AHCCCS website for public comment on January 13, 2023, and on August 23, 2024, at <https://www.azahcccs.gov/YATIWaiverRequest>. The web page includes a summary of Arizona's demonstration amendment request, the schedule (dates and times) of public forums across the state and the draft Demonstration amendment proposal. In addition to the website posting, AHCCCS used social media accounts and electronic mail to notify interested parties about Arizona's demonstration amendment proposal.

Publication of Public Notice in the Arizona Administrative Register

On January 13, 2023 and on August 23, 2024, public notice of Arizona's demonstration amendment request was published in the Arizona Administrative Register. The notice included a summary description of the Demonstration request, locations, dates and times of the public hearings, instructions on how to submit comments, and a link to copies of the demonstration application for public review and comments. Details of the public notice registry, forums, and communication can be found in **Appendix B**.

Stakeholder Meetings

AHCCCS presented the details of Arizona's Demonstration amendment proposal during two virtual Tribal Consultation meetings on February 9, 2023, and August 5, 2024, and conducted four virtual public forum meetings on January 23, 2023, February 22, 2023, August 29, 2024, and September 12, 2024. In addition, the demonstration amendment proposal was presented at two State Medicaid Advisory Committee (SMAC) meetings on January 11, 2023, and October 9, 2024. Stakeholders were also able to submit comments and questions on the proposed 1115 Waiver amendment request by email to: waiverpublicinput@azahcccs.gov, or by mail to: AHCCCS, c/o OOD-Division of Public Policy and Strategic Planning; 801 E. Jefferson Street, MD 4200, Phoenix, AZ 85034. All comments must have been received by February 27, 2023, and October 10, 2024. More information about the proposed 1115 Waiver amendment, including the proposed 1115 Waiver application and the full public notice and public input process, can be found on <https://www.azahcccs.gov/YATIWaiverRequest>. Details regarding the public forum meetings can be found in **Appendix C**.

VII. Public Comment Summary

As part of Arizona's Former Foster Youth- Eligibility and Enrollment Waiver amendment, AHCCCS acknowledged, reviewed, and considered all comments it received through the public input process. Overall, AHCCCS directly engaged more than 220 stakeholders across the state and received over 30 responses from stakeholders, including, but not limited to, providers, public health organizations, legal advocates, tribal organizations, hospitals, and consumer advocacy groups. Copies of the written comments are included in **Appendix D (2024)** and **Appendix E (2023)**. All comments were supportive of the proposed services, a summary of the key themes is included below. AHCCCS considered and, in some cases, used the comments to help inform changes to the Former Foster Youth-Eligibility and Enrollment waiver proposal.

Former Foster Youth- Eligibility and Enrollment

Statements of Support

All comments received were supportive of automatic annual renewals and the new amendment for former foster youth individuals. The letters of support recognized the vulnerability of the individuals who age out of the foster youth system and the increased need to promote continuity of health care and coverage within this population. Moreover, stakeholders were in strong support of automatic renewals to reduce unnecessary eligibility churn and promote health equity.

Arizona's Response: AHCCCS is appreciative of the unanimous support for the needs that will be addressed through the solutions proposed in the Former Foster Youth - Eligibility and Enrollment Renewal waiver proposal.

Consideration of Additional Services

Stakeholders requested consideration of additional services beyond those identified in the Former Foster Youth Eligibility and Enrollment Renewal waiver proposal including adding an outreach component that would target former foster youth who are no longer enrolled in Medicaid under the YATI category but may still be eligible for benefits.

Arizona's Response:

The current proposal outlined above provides access to a full array of benefits for qualified Former Foster Youth who have aged out of the foster care program, consistent across all populations as they qualify. Arizona is a mandatory managed care state. For all Medicaid members including those qualified through this requested amendment, it is the Managed Care Organizations' (MCOs) responsibility to provide outreach including but not limited to comprehensive care coordination, community outreach, engagement, re-engagement, and closure. These outreach services also include specified populations including substance abuse and gender-specific outreach. The MCO is responsible to organize, develop, implement, and document provider level trainings, materials, and implementation outcomes for Non-Title XIX/XXI services, including at a minimum:

1. Services
2. Availability
3. Referral processes
4. Outreach and Engagement

Generally, outreach to non-Medicaid members is not a Medicaid compensable service, however, outreach targeting non-Medicaid members have recently been approved through Arizona's Housing and Health Opportunity (H2O) demonstration in which case management, outreach, and education including linkages to other state and federal benefit programs is supported and could impact the Former Foster Youth population.

VIII. BUDGET NEUTRALITY

Details regarding Budget Neutrality can be found in **Appendix A**.

APPENDIX A

Budget Neutrality



ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM
YATI

Program Category	FFY2023	FFY2024	FFY2025	FFY2026	FFY2027	Total
MM (Assuming 250 members)			3,000	3,000	3,000	9,000
PMPM			\$ 373.61	\$ 388.55	\$ 404.09	
Expenditures			\$1,120,800	\$1,165,700	\$1,212,300	\$3,498,800
FMAP			64.89%	64.44%	64.44%	
Federal Share			727,300	751,200	781,200	2,259,700
State Share			393,500	414,500	431,100	1,239,100

APPENDIX B

Waiver Amendment Public Notice



NOTICES OF PUBLIC INFORMATION

Agencies use Notices of Public Information to notify stakeholders about other information that pertains to rulemaking notices under A.R.S. § 41-1013(B)(14). When required by law, agencies also use this notice to notify the public about information not related to rulemaking.

The most common use for this notice is to correct errors printed in a rulemaking notice or extend a public comment period.

The Administrative Rules Division of the Office does not provide a standard template for Notices of Public Information because the content of this type of notice varies.

An agency shall follow the Office's formatting standards when preparing this type of notice and use a numbered list of questions and answers. Additionally, an agency receipt shall be filed with a Notice of Public Information.

NOTICE OF PUBLIC INFORMATION

ARIZONA HEALTH CARE COST CONTAINMENT SYSTEM (AHCCCS)

[M24-41]

1. Agency Name:

Arizona Health Care Cost Containment System (AHCCCS)

2. Agency Contact information:

Name: Sladjana Kuzmanovic
 Title: Sr. Rules Analyst
 Division: Office of the General Counsel
 Address: 801 E. Jefferson St., MD6200
 Phoenix, AZ 85034
 Telephone: (602) 417-4232
 Fax: (602) 253-9115
 Email: AHCCCSRules@azahcccs.gov
 Website: www.azahcccs.gov

3. The public information:

AHCCCS 1115 Research and Demonstration Waiver Amendment Request

I. Summary

The Arizona Health Care Cost Containment System (AHCCCS) is requesting an amendment to the 1115 Research and Demonstration Waiver, Project Number 11-W-00275/9, to seek authority to:

1. Waive the condition of eligibility in 42 CFR 435.608 requiring Medicaid beneficiaries to apply for other cash benefits for the Former Foster Youth (FFY) population.
2. Relieve individuals who meet the statutory definition at 1902(a)(10)(A)(i)(IX) of the obligation to provide information about potentially liable third parties at renewal as a condition of eligibility.
3. Extend eligibility for full Medicaid state plan benefits to FFY who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona.

AHCCCS currently offers transitional medical care for children leaving foster care that are between the ages 18 to 26. AHCCCS refers to this group as the Young Adult Transitional Insurance (YATI) population. For those who qualify, there are no monthly premiums.

The goal of the Former Foster Youth- Eligibility and Enrollment amendment is to:

- Promote continuity of care and coverage,
- Move toward administrative simplification,
- Reduce health disparities for the target population, and
- Reduce unnecessary eligibility churn.

The first request is in alignment with House Bill 2622 passed by Arizona's 55th Legislature. Subject to approval from CMS, the AHCCCS administration is required to annually renew the eligibility of an individual who was in the custody of the Arizona Department of Child Safety (DCS) when the individual reached 18 years of age without requiring additional information from the individual until the individual reaches 26 years of age, unless the individual notifies AHCCCS that the individual moved out of Arizona or has provided information indicating that the individual may qualify for a different eligibility category.

The second request is in response to Section 1002(a) of the SUPPORT Act which created a Former Foster Care Children (FFCC) Medicaid state plan eligibility group, providing coverage for individuals who were receiving Medicaid while in foster care under the responsibility of any state. However, the SUPPORT Act requirements apply exclusively to individuals

who turn 18 on or after January 1, 2023. As a result, Arizona requests section 1115 demonstration authority to continue coverage for individuals who turned 18 years old on or before December 31, 2022, until a beneficiary reaches age 26.

The State requests that expenditures for service provision to the YATI population including the waiver from 42 CFR 435.608 as described above be regarded as expenditures under the State's Medicaid Title XIX State Plan.

II. Proposed Eligibility Requirements under the Demonstration

AHCCCS is seeking a five-year Medicaid Section 1115 Research and Demonstration Waiver that promotes continuity of care, administrative simplification, and reduces unnecessary eligibility churn. The Demonstration is designed to provide quality healthcare and improve health outcomes through continuity of care for the Former Foster Youth Population, while reducing administrative burdens.

Foster youth and former foster youth have a higher risk of experiencing multiple chronic health conditions and health related social needs (HRSN), beyond what is associated with socioeconomic instability, including:

Increased prevalence of physical and behavioral health needs:

- Foster youth frequently experience adverse childhood experiences – such as abuse, neglect, domestic violence, and parental substance abuse – that increase the risk of serious health problems later in life, including:
 - Severe obesity, diabetes, heart disease, cancer, stroke, chronic obstructive pulmonary disease (COPD), and broken bones.
- Former Foster Youth are twice as likely to experience PTSD compared to Iraq combat veterans.
- Former Foster Youth are twice as likely to experience depression compared to the general population.
- Former Foster Youth are more likely to suffer from anxiety and attempt suicide.

Higher rates of homelessness:

- Youths aging out of foster care are at high risk for becoming homeless during the transition to adulthood. One in five report being homeless between ages 17 and 19, and over one in four (29%) report being homeless from 19 to 21. Among American Indian young adults, the figure jumps to almost half (43%) for ages 19 to 21. Furthermore, homelessness becomes a huge contributing factor to returned mail and failure to comply with the procedural requirements for continued eligibility.

Further, quality health care through easier to access Medicaid coverage is a critical driver of health and health outcomes for low income adults with chronic conditions, and former foster youth show an even higher reliance on public insurance coverage options than the general population:

- Medicaid coverage rates among one cohort surveyed in 2014 and 2016 (after the creation of the former foster youth group):
 - 89% of 19-year-olds in foster care have Medicaid coverage, and
 - 69% of 19-year-olds no longer in foster care have Medicaid coverage.

Considering this population's higher reliance on public insurance options such as Medicaid, former foster youth experience known barriers to Medicaid coverage, including:

- Former foster youth can be a hard-to-reach population, the effects of which can be compounded by state systems/operations that do not ensure continuity of coverage for youth leaving foster care or facilitate streamlined re-enrollment.

III. Waiver Amendment Proposal Details

A. Proposed Cost Sharing Requirements under the Demonstration as Amended:

This demonstration does not change the Medicaid benefit package design; there is no new cost-sharing, copayments, or coinsurance for any benefit provided under the waiver. State Plan benefits will continue to be applied in accordance with the State Plan and all eligibility groups will continue to receive all State Plan benefits.

B. Proposed Changes to the Delivery System under the Demonstration as Amended:

The delivery system for persons impacted by this proposed 1115 Waiver amendment will not vary from AHCCCS' current program features as described in the current State Plan and demonstration.

C. Proposed Changes to Benefit Coverage under the Demonstration as Amended:

This demonstration does not change the Medicaid benefit package design; there are no new or fewer services, cost-sharing, copayments, or coinsurance for any benefit provided under the waiver. State Plan benefits will continue to be applied in accordance with the State Plan and all eligibility groups will continue to receive all State Plan benefits.

D. Proposed Changes to Eligibility Requirements:

For individuals determined to meet the Former Foster Youth criteria at Social Security Act Section 1902(a)(10)(A)(i)(IX), annually renew eligibility on an automatic basis without requiring additional information from the person until the person reaches twenty-six years of age, unless:

1. The person notifies the administration that they may qualify for a different eligibility category,
2. The Agency or its designee receives information from the person or a reliable electronic data match that the person is no longer an Arizona resident, or
3. The individual withdraws the enrollment voluntarily or is deceased.

IV. Waiver and Expenditure Authorities Necessary to Authorize the Demonstration

Application for other benefits

(42 CFR 435.608)

To the extent necessary to relieve individuals who meet the statutory definition at 1902(a)(10)(A)(i)(IX) of the obligation to apply for other cash benefits at renewal as a condition of eligibility.

Cooperation to assist in pursuing third parties who may be liable to pay

(42 CFR 433.147)

To the extent necessary to relieve individuals who meet the statutory definition at 1902(a)(10)(A)(i)(IX) of the obligation to provide information about potentially liable third parties at renewal as a condition of eligibility.

Former foster care children

(42 CFR 435.150)

To waive the limitation on former foster care children eligibility established at 42 CFR 435.150, as a result of changes implemented under Section 1002(a) of the SUPPORT Act, which created a Former Foster Care Children (FFCC) Medicaid state plan eligibility group, providing coverage for individuals who were receiving Medicaid while in foster care under the responsibility of any state. The SUPPORT Act requirements apply exclusively to individuals who turn 18 on or after January 1, 2023. AHCCCS seeks to extend eligibility for full Medicaid state plan benefits to FFY who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona.

Former foster care children

Expenditures for former foster care children who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona.

V. Evaluation Design

Arizona's 1115 Waiver Evaluation design for Project Number 11-W-00275/9, will be modified to incorporate the Former Foster Youth- Eligibility and Enrollment waiver amendment. The demonstration will test whether this demonstration, if approved, effectively promotes continuity of care, simplifies administrative burden, and reduces unnecessary churn of individuals' eligibility to access Medicaid covered services. In addition, the demonstration will be tested to assess the provision of quality health care and improvement in health outcomes through continuity of care to the Former Foster Youth Population.

Objectives	Proposed Hypotheses	Potential Approaches
The AHCCCS Former Foster Youth Annual Automatic Renewal demonstration will promote continuity of care, simplify administrative burden and reduce unnecessary churn of individuals' eligibility to access Medicaid Services	The AHCCCS Former Foster Youth Annual Automatic Renewal demonstration will maintain or improve health outcomes for AHCCCS members.	Data will be drawn from a variety of sources including, but not limited to: <ul style="list-style-type: none"> • Member surveys, • State eligibility and enrollment data, • Claims/encounter data, • Administrative program data (PMMIS), • T-MSIS, • National/regional benchmarks, and • Key informant interviews and focus groups.
	The AHCCCS Former Foster Youth Annual Automatic Renewal demonstration will maintain or improve the management of chronic conditions for AHCCCS members.	
	The AHCCCS Former Foster Youth Annual Automatic Renewal demonstration will maintain or improve access to care for AHCCCS members	
	The AHCCCS Former Foster Youth Annual Automatic Renewal demonstration will maintain or increase utilization of primary care and preventative health services.	
	The AHCCCS Former Foster Youth Annual Automatic Renewal demonstration will maintain or improve member satisfaction with care.	
	The AHCCCS Former Foster Youth Annual Automatic Renewal demonstration will promote continuity of care for its members.	
	The AHCCCS Former Foster Youth Annual Automatic Renewal demonstration will yield cost-effective care for AHCCCS members.	

VI. Public Notice Process

Pursuant to the terms and conditions that govern Arizona's Demonstration, Arizona must provide documentation of its compliance with Demonstration of Public Notice process (42 CFR 431.408), the tribal consultation requirements pursuant to Section 1902(a)(73) of the Act as amended by Section 5006(e) of the American Recovery and Reinvestment Act of 2009, and the tribal consultation requirements outlined in STC 13.

Public Website

The demonstration amendment request was posted on the AHCCCS website for public comment on August 5, 2024, at <https://www.azahcccs.gov/YATIWaiverRequest>. The web page includes a summary of Arizona's demonstration amendment request, the schedule (dates and times) of public forums across the state and this draft demonstration amendment proposal. In addition to the website posting, AHCCCS uses social media accounts and electronic mail to notify interested parties about Arizona's demonstration amendment proposal.

Publication of Public Notice in the *Arizona Administrative Register*

On August 23, 2024, public notice of Arizona's demonstration amendment request was published in the *Arizona Administrative Register*. The notice included a summary description of the demonstration request, locations, dates and times of the public hearings, instructions on how to submit comments, and a link to copies of the demonstration application for public review and comments.

Stakeholder Meetings

AHCCCS will present the details about Arizona's Demonstration amendment proposal during a Tribal Consultation meeting and will conduct two virtual public forum meetings. In addition, the Demonstration amendment proposal will be presented at the State Medicaid Advisory Committee (SMAC) meeting on October 9, 2024. Details regarding the public forum meetings can be found below:

Public Forum Meeting	Meeting Dates & Times	Meeting Web Link & Call-in Information
Tribal Consultation	August 5, 2024, 8:30 a.m. - 4:30 p.m. AZ Time	<p>Register in advance for this webinar: https://ahcccs.zoom.us/join/852586791270</p> <p>Or join by phone: US: +1 408 638 0968 or +1 669 444 9171 or +1 669 900 6833 or +1 719 359 4580 or +1 253 205 0468 or +1 253 215 8782 or +1 346 248 7799 or +1 507 473 4847 or +1 564 217 2000 or +1 646 876 9923 or +1 646 931 3860 or +1 689 278 1000 or +1 301 715 8592 or +1 305 224 1968 or +1 309 205 3325 or +1 312 626 6799 or +1 360 209 5623 or +1 386 347 5053</p> <p>Meeting ID: 825 8679 1270 Passcode: 566816944</p>

Public Forum #1	August 29, 2024, noon - 2:00 p.m. AZ Time	<p>Register in advance for this webinar: https://ahcccs.zoom.us/webinar/register/WN_xukk0BIsQAWN2HOWi6if6w</p> <p>Or join by phone: US: +1 669 900 6833 or +1 719 359 4580 or +1 253 205 0468 or +1 253 215 8782 or +1 346 248 7799 or +1 408 638 0968 or +1 669 444 9171 or +1 507 473 4847 or +1 564 217 2000 or +1 646 876 9923 or +1 646 931 3860 or +1 689 278 1000 or +1 301 715 8592 or +1 305 224 1968 or +1 309 205 3325 or +1 312 626 6799 or +1 360 209 5623 or +1 386 347 5053</p> <p>Webinar ID: 840 8614 0308 Passcode: 71095626</p>
Public Forum #2	September 12, 2024, 11:00 a.m. - 1:00 p.m. AZ Time	<p>Register in advance for this webinar: https://ahcccs.zoom.us/webinar/register/WN_z805w5oARgSB5rtcoksS6g</p> <p>Or join by phone: US: +1 669 900 6833 or +1 719 359 4580 or +1 253 205 0468 or +1 253 215 8782 or +1 346 248 7799 or +1 408 638 0968 or +1 669 444 9171 or +1 309 205 3325 or +1 312 626 6799 or +1 360 209 5623 or +1 386 347 5053 or +1 507 473 4847 or +1 564 217 2000 or +1 646 876 9923 or +1 646 931 3860 or +1 689 278 1000 or +1 301 715 8592 or +1 305 224 1968</p> <p>Webinar ID: 812 1753 9951 Passcode: 14841342</p>

State Medicaid Advisory Committee (SMAC)	October 9, 2024, 1:00 p.m. - 3:00 p.m. AZ Time	<p>Register in advance for this webinar: https://ahcccs.zoom.us/join/9tZqpmUBUYWC6Psw?xzm_rtaid=3DyfQlb_SHyiq1y33WOeg.1722466070904.f4f9aadb960b815f63c5a36507-fa41d6&xzm_rhtaid=197#/registration</p> <p>Or join by phone: US: +1 669 444 9171 or +1 669 900 6833 or +1 719 359 4580 or +1 253 205 0468 or +1 253 215 8782 or +1 346 248 7799 or +1 408 638 0968 or +1 305 224 1968 or +1 309 205 3325 or +1 312 626 6799 or +1 360 209 5623 or +1 386 347 5053 or +1 507 473 4847 or +1 564 217 2000 or +1 646 876 9923 or +1 646 931 3860 or +1 689 278 1000 or +1 301 715 8592</p> <p>Webinar ID: 820 2219 9346 Passcode: 852162836</p>
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Comments and questions about the proposed 1115 Waiver amendment request can also be submitted by email to: waiverpublicinput@azahcccs.gov or by mail to: AHCCCS, c/o Division of Community Advocacy and Intergovernmental Relations (DCAIR); 801 E. Jefferson Street, MD 4200, Phoenix, AZ 85034. All comments must be received by October 10, 2024. More information about the proposed 1115 Waiver amendment, including the proposed 1115 Waiver application and the full public notice and public input process, can be found on <https://www.azahcccs.gov/YATTWaiverRequest>.

VII. Budget Neutrality

This proposal will not have a material impact on the state's budget neutrality model for demonstration number 11-W-00275/9.

NOTICE OF PUBLIC INFORMATION

DEPARTMENT OF HEALTH SERVICES

[M24-42]

1. Title of the substantive policy statement and the number by which the policy statement is referenced:

SP-064-PHL-VRS: Clarification of a Procurement Organization as a "Responsible Person"

2. The public information relating to the substantive policy statement:

The purpose of this substantive policy statement was to notify the public of the Arizona Department of Health Services' (Department) interpretation of the term "responsible person" as it applies to the completion and submission of information for the registration of a deceased individual's death, when a procurement organization is authorized to provide final disposition of human remains according to Arizona Revised Statutes (A.R.S.) § 36-844 or 36-849. The Department has determined that the substantive policy statement is not necessary and not utilized by the public. The necessary information is already covered within internal program policies.

3. The name and address of agency personnel with whom persons may communicate regarding this notice of public information:

Name: Katina Lugo
Title: Bureau Chief
Division: Division of Policy and Intergovernmental Affairs
Address: Arizona Department of Health Services
Bureau of Vital Records
150 N. 18th Ave., Suite 120
Phoenix, AZ 85007
Telephone: (602) 364-1719
Fax: (602) 364-1257
Email: Katina.Lugo@azdhs.gov
or

Former Foster Youth- Eligibility and Enrollment (YATI) Forums

The Arizona Health Care Cost Containment System (AHCCCS) is requesting an amendment to the 1115 Research and Demonstration Waiver, Project Number 11-W-00275/9, to seek authority to extend eligibility for full Medicaid state plan benefits to Former Foster Youth (FFY) who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona. AHCCCS currently offers transitional medical care for children leaving foster care that are between the ages 18 to 26.



AHCCCS presented the details about Arizona's Demonstration amendment proposal during a hybrid Tribal Consultation meeting and will share further details at two virtual public forum meetings. In addition, the Demonstration amendment proposal will be presented at the State Medicaid Advisory Committee (SMAC) meeting. Details regarding the public forum meetings can be found below:

Forum Registration and Webinar Details

PUBLIC FORUMS	
Dates	Zoom Links
Tribal Consultation August 5, 2024 8:30 a.m. -4:30 p.m. AZ Time	Register in advance for this webinar: Or join by phone: US: +1 408 638 0968, +1 669 444 9171, +1 669 900 6833, +1 719 359 4580, +1 253 205 0468, +1 253 215 8782, +1 346 248 7799, +1 507 473 4847, +1 564 217 2000, +1 646 876 9923, +1 646 931 3860, +1 689 278 1000 Webinar ID: 825 8679 1270 Passcode: 566816944 In-Person Location: Twin Arrows Navajo Casino Resort - 22181 Resort Blvd, Flagstaff, AZ 86004
Public Forum #1 August 29, 2024 Noon -2:00 p.m. AZ Time	Register in advance for this webinar: Or join by phone: US: +1 669 900 6833, +1 719 359 4580, +1 253 205 0468, +1 253 215 8782, +1 346 248 7799, +1 408 638 0968, +1 669 444 9171, +1 507 473 4847, +1 564 217 2000, +1 646 876 9923, +1 646 931 3860 Webinar ID: 840 8614 0308 Passcode: 71095626
Public Forum #2 September 12, 2024 11:00 a.m. -1:00 p.m. AZ Time	Register in advance for this webinar: Or join by phone: US: +1 669 900 6833, +1 719 359 4580, +1 253 205 0468, +1 253 215 8782, +1 346 248 7799, +1 408 638 0968, +1 669 444 9171, +1 309 205 3325, +1 312 626 6799, +1 360 209 5623, +1 386 347 5053 Webinar ID: 812 1753 9951 Passcode: 14841342
State Medicaid Advisory Committee (SMAC) October 9, 2024 1:00 p.m.- 3:00 p.m. AZ Time	Register in advance for this webinar: Or join by phone: US: +1 669 444 9171, +1 669 900 6833, +1 719 359 4580, +1 253 205 0468, +1 253 215 8782, +1 346 248 7799, +1 408 638 0968, +1 305 224 1968, +1 309 205 3325, +1 312 626 6799, +1 360 209 5623 Webinar ID: 820 2219 9346 Passcode: 852162836



NEWS

September 1, 2024

You're Invited to AHCCCS Community Events in September

Join AHCCCS for community meetings each month. These meetings are designed to help members, families, and stakeholders learn about programs and initiatives, and to solicit feedback. We ask you to share this information with your patients, clients, families, and stakeholders so they can better understand Arizona's Medicaid services and how to find community resources and tools. All of these events are posted on the [AHCCCS calendar](#) on www.azahcccs.gov. For previous presentations, please visit the Community Presentations Archive section on the [Community Presentations](#) web page.

AHCCCS Community Forum

TOPIC: Former Foster Youth-Eligibility and Enrollment (YATI) Forums

WHEN: Thursday, September 12, 2024

WHERE: Online on Zoom. [Register in advance.](#)

WHO SHOULD ATTEND: AHCCCS members and their families, Foster Families, Former Foster Youth, community members, behavioral health professionals, providers, advocates, and/or anyone who wants to learn more about Arizona's Medicaid program.

WHAT YOU'LL LEARN: We need your input! In this amendment proposal, AHCCCS is seeking authority to extend eligibility for full Medicaid state plan benefits to Former Foster Youth (FFY) who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona. For more information, please visit the [Former Foster Youth Waiver](#) web page.

Share this [flier](#) with your stakeholders.

AHCCCS Hot Topics

TOPIC(S): Targeted Investments 2.0 Overview

WHEN: Monday, September 16, 2024

WHERE: Online on Zoom. [Register in advance.](#)

WHO SHOULD ATTEND: AHCCCS members and their families, community members, behavioral health professionals, providers, advocates, and/or anyone who wants to learn more about Arizona's Medicaid program.

WHAT YOU'LL LEARN: Join us to learn about Targeted Investments 2.0, next steps for participants, and opportunities to submit feedback to AHCCCS.

Share this [flier](#) with your stakeholders.

JACOB'S LAW TRAINING

TOPIC(S): Jacob's Law

WHEN: Thursday, September 19, 2024

WHERE: Online on Zoom. [Register in advance.](#)

WHO SHOULD ATTEND: AHCCCS members and their families, community members, behavioral health professionals, providers, advocates, and/or anyone who wants to learn more about Arizona's Medicaid program.

WHAT YOU'LL LEARN: This training covers the overview of Jacob's Law (HB2442), review and use of the DCS placement packet, legal rights & protections for children and resource parents, and covered services.

Share this [flier](#) with your stakeholders.

OIFA SYSTEM NAVIGATION MEETING

TOPIC(S): Kidscare

WHEN: Tuesday, September 24, 12 p.m. - 12:30 p.m.

WHERE: Online on Zoom. [Register in advance.](#)

WHO SHOULD ATTEND: AHCCCS members and their families, community members, behavioral health professionals, providers, advocates, and/or anyone who wants to learn more about Arizona's Medicaid program.

WHAT YOU'LL LEARN: AHCCCS offers health insurance through KidsCare for eligible children (under age 19) who are not eligible for other AHCCCS health insurance. KidsCare covers doctor office visits, immunizations, hospitalization, emergency room care, laboratory and x-ray, prescription drugs, dental services, behavioral health services, vision care and more medically necessary services.

Share this [flier](#) with your stakeholders.

OFFICE OF HUMAN RIGHTS

TOPIC(S): The Power of Collaboration and Advocacy for Individuals Living with a Serious Mental Illness

WHEN: Tuesday, September 24, 10:30 am - 12:00 pm




WHERE: Online on Zoom. [Register in advance.](#)

WHO SHOULD ATTEND: AHCCCS members living with a Serious Mental Illness (SMI) designation, family members, people who are natural supports, providers who serve these members, stakeholders, and community advocates.

WHAT YOU'LL LEARN: Join us to learn more about the Power of Collaboration and Advocacy as it pertains to individuals living with an SMI.

Share this [flier](#) with your stakeholders.


Facebook


 **Arizona Health Care Cost Containment System**  6d · 





We need your input! Submit a public comment on our 1115 Waiver amendment for Former Foster Youth -Eligibility and Enrollment. Comments can be submitted via email to waiverpublicinput@azahcccs.gov by Oct. 10, 2024. More information <https://ow.ly/CISP50TwNtF>




[#Medicaid](#) [#AHCCCS](#) [#Arizona](#) [#FosterYouth](#)

**1115 Waiver Public Comment
Former Foster Youth -
Eligibility and Enrollment**




Arizona Health Care Cost Containment System


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 **Arizona Health Care Cost Containment System**  1d · 


Join us next Thursday (9/12) to provide your input on our 1115 Waiver amendment for Former Foster Youth-Eligibility and Enrollment. Register in advance: <https://ow.ly/6jkc50TfWAq>





[#AHCCCS](#) [#Arizona](#) [#Medicaid](#) [#FosterYouth](#)

**Waiver Amendment Forum:
Former Foster Youth -
Eligibility and Enrollment**



**Sep 12
11:00 a.m.
Online**


Arizona Health Care Cost Containment System

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Arizona Health Care Cost Containment System

22h · 🌐

Your feedback is very valuable! Join AHCCCS on Aug. 29, 2024 at noon to discuss our proposed 1115 Waiver amendment for Former Foster Youth -Eligibility and Enrollment. Register in advance: <https://ow.ly/Ck3z50T845C>

#fostercare #AHCCCS #healthinsurance #Medicaid

Waiver Amendment Forum: Former Foster Youth - Eligibility and Enrollment

Aug. 29
Noon
Online



AHCCCS

1



Arizona Health Care Cost Containment System

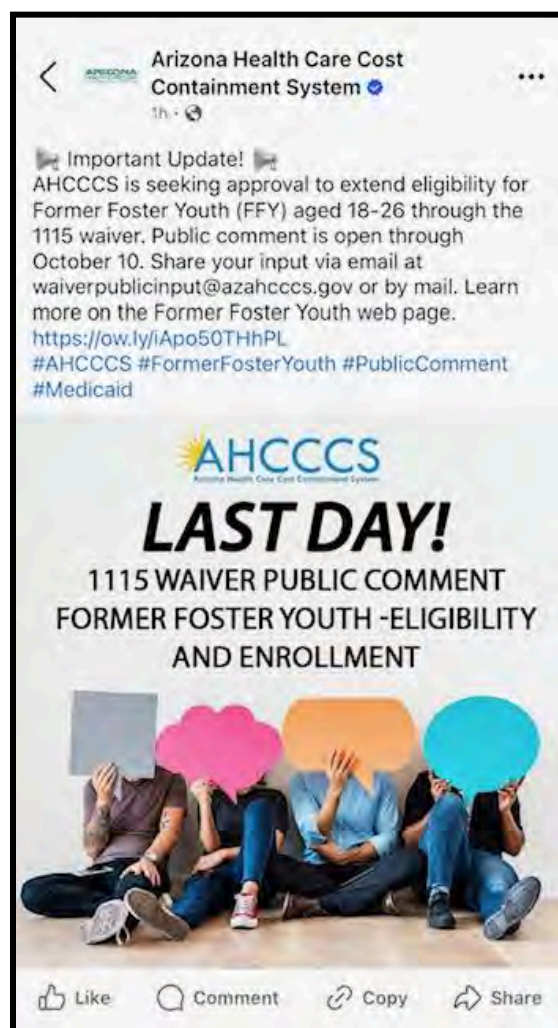
23h · 🌐

We need your input! The federal comment period is now open until Oct. 10, 2024. AHCCCS is requesting permission to extend eligibility for Former Foster Youth (FFY) aged 18-26 through our 1115 Waiver. For more information, please visit the Former Foster Youth Waiver web page <https://ow.ly/OVqN50T6WiC>.

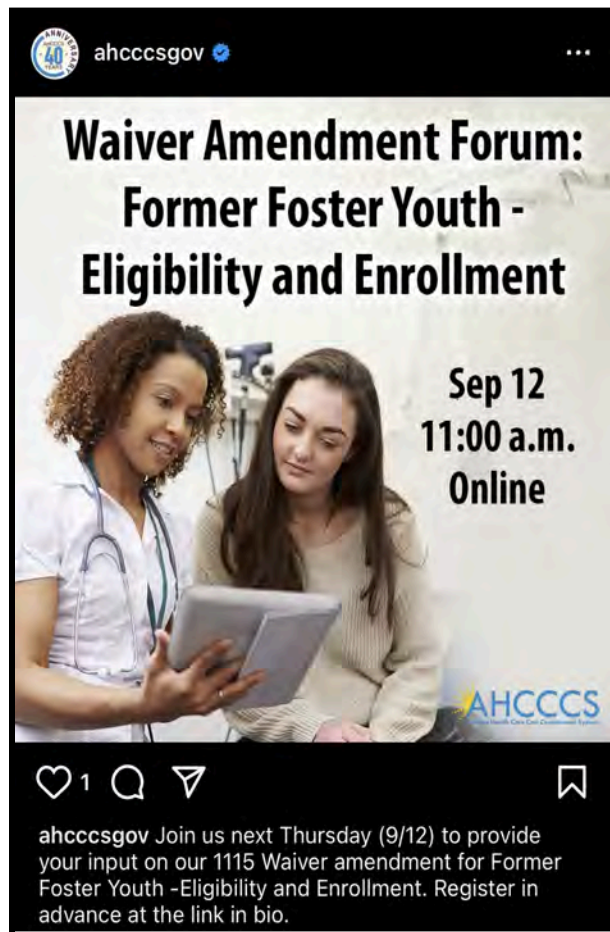
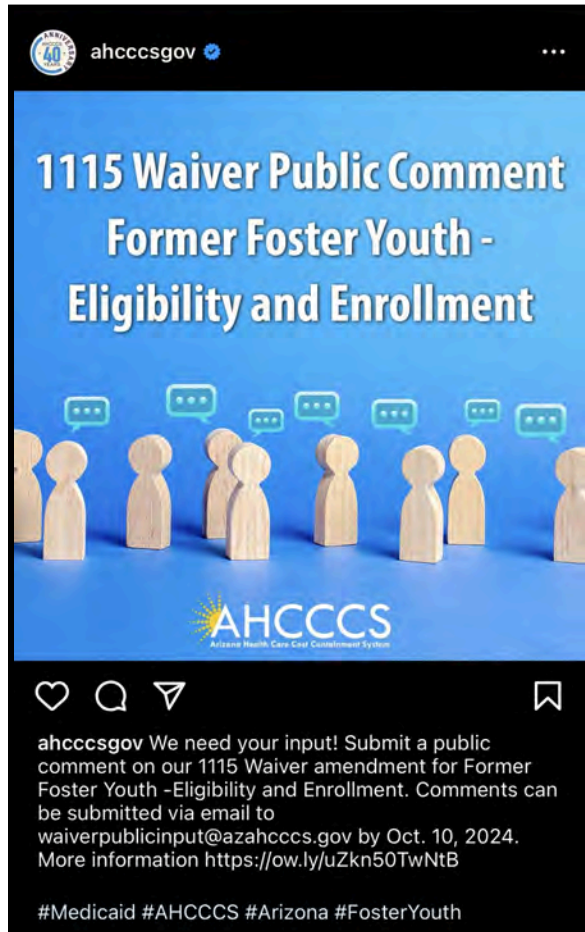
AHCCCS

ATTN: Public Comment Period Now Open





Instagram



40

anniversary

ahcccsgov

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AHCCCS

A Health Plan of Care and Enrollment

ATTN: Public Comment
Period Now Open



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ahcccsgov Public comment is now open regarding AHCCCS plans to extend eligibility to Former Foster Youth under age 26. The comment period is open until Oct. 10, and they need YOUR input. Three upcoming forums will provide information about the amendment proposal and collect feedback. Information and registration at the Former Foster Youth Waiver page. Link in bio. #Medicaid #FosterCare #HealthInsurance #Arizona

40

anniversary

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AHCCCS

A Health Plan of Care and Enrollment

Waiver Amendment Forum:
Former Foster Youth -
Eligibility and Enrollment

Aug. 29
Noon
Online



AHCCCS

A Health Plan of Care and Enrollment

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ahcccsgov Your feedback is very valuable! Join AHCCCS on Aug. 29, 2024 at noon to discuss our proposed 1115 Waiver amendment for Former Foster Youth -Eligibility and Enrollment. Register in advance: see link in bio.

#fostercare #AHCCCS #healthinsurance #Medicaid

22 hours ago



ahcccs.gov



LAST DAY!

1115 WAIVER PUBLIC COMMENT
FORMER FOSTER YOUTH - ELIGIBILITY
AND ENROLLMENT



ahcccs.gov 📢 Important Update! 📢

AHCCCS is seeking approval to extend eligibility for Former Foster Youth (FFY) aged 18-26 through the 1115 waiver. Public comment is open through October 10. Share your input via email at waiverpublicinput@azahcccs.gov or by mail. Learn more on the Former Foster Youth web page - link in bio.


#AHCCCS #FormerFosterYouth #PublicComment #Medicaid

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We need your input! Submit a public comment on the AHCCCS 1115 Waiver amendment for Former Foster Youth - Eligibility and Enrollment. Comments can be submitted via email to waiverpublicinput@azahcccs.gov by Oct. 10, 2024. More information at link in bio.

**1115 Waiver Public Comment
Former Foster Youth -
Eligibility and Enrollment**



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Join us next Thursday (9/12) to provide your input on our 1115 Waiver amendment for Former Foster Youth-Eligibility and Enrollment. Register in advance: <https://ow.ly/cXWy50TfWAr>

#AHCCCS #Arizona #Medicaid #FosterYouth

**Waiver Amendment Forum:
Former Foster Youth -
Eligibility and Enrollment**

**Sep 12
11:00 a.m.
Online**



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Public comment is open regarding AHCCCS plans to extend eligibility to Former Foster Youth under age 26. The comment period is open until Oct. 10. Three upcoming forums will provide information about the amendment proposal and collect feedback. page.<https://ow.ly/75Qx50T6Ngx>



Former Foster Youth Annual Automatic Renewal
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Public comment is open regarding AHCCCS plans to extend eligibility to Former Foster Youth under age 26. The comment period is open until Oct. 10. Three upcoming forums will provide information about the amendment proposal and collect feedback. page.<https://ow.ly/75Qx50T6Ngx>



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Your feedback is very valuable! Join AHCCCS on Aug. 29, 2024 at noon to discuss our proposed 1115 Waiver amendment for Former Foster Youth -Eligibility and Enrollment. Register in advance: <https://ow.ly/lvZK50T845B>

#fostercare #AHCCCS #healthinsurance #Medicaid



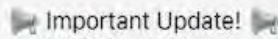
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AHCCCS is seeking approval to extend eligibility for Former Foster Youth (FFY) aged 18-26 ...see more



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FORMER FOSTER YOUTH -ELIGIBILITY
AND ENROLLMENT



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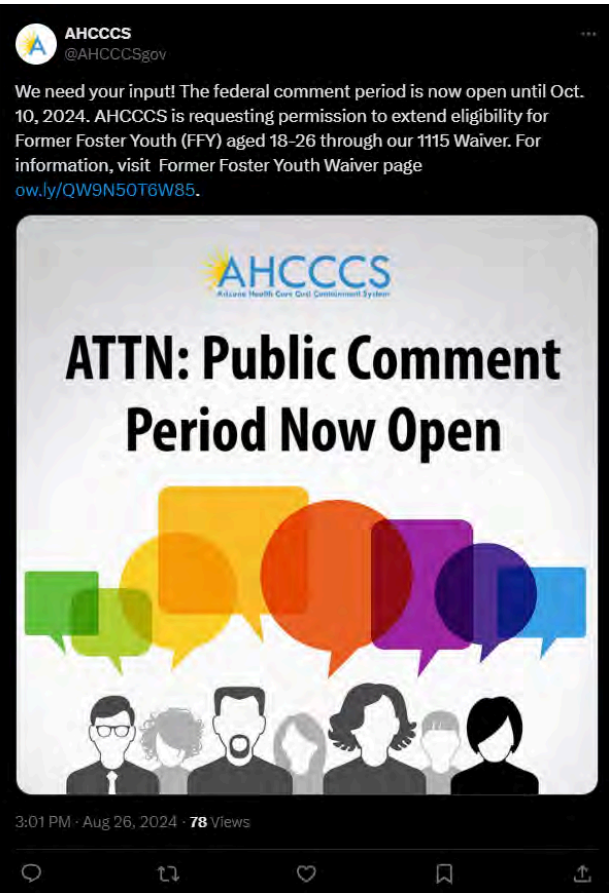


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@AHCCCSgov

We need your input! Submit a public comment on our 1115 Waiver amendment for Former Foster Youth -Eligibility and Enrollment. Comments can be submitted via email to waiverpublicinput@azahcccs.gov by Oct. 10, 2024. More information ow.ly/G1xf50TwNtC

#Medicaid #AHCCCS

1115 Waiver Public Comment Former Foster Youth - Eligibility and Enrollment



6:00 PM · Sep 26, 2024 · 66 Views



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@AHCCCSgov

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Public comment is open regarding AHCCCS plans to extend eligibility to Former Foster Youth under age 26. The comment period is open until Oct. 10.

Three upcoming forums will provide information about the amendment proposal and collect feedback. [page.ow.ly/6Nz150T6Ngw](https://ow.ly/6Nz150T6Ngw)

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Join us next Thursday (9/12) to provide your input on our 1115 Waiver amendment for Former Foster Youth-Eligibility and Enrollment. Register in advance: ow.ly/jCfe50TfWAp

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AHCCCS is seeking approval to extend eligibility for Former Foster Youth (FFY) aged 18-26 through the 1115 waiver. Public comment is open through October 10. Learn more on Former Foster Youth web page

ow.ly/95LB50THhPM

#AHCCCS #FormerFosterYouth

#PublicComment #Medicaid





LAST DAY!

1115 WAIVER PUBLIC COMMENT
FORMER FOSTER YOUTH -ELIGIBILITY
AND ENROLLMENT




AHCCCS Home Page - Banner



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Public Comment Period Open for Former Foster Youth Amendment

AHCCCS Community Presentations Web Page

HOME	AHCCCS INFO	MEMBERS/APPLICANTS	PLANS/PROVIDERS	AMERICAN INDIANS	RESOURCES	FRAUD PREVENTION	CRISIS SERVICES
Register in advance for this event Flier							
Wednesday, July 24, 2024, 2:00 p.m. to 3:30 p.m.		AHCCCS Community Forum		Online on Zoom		Join AHCCCS to learn about Arizona Long Term Care System - Elderly and Physically Disabled (ALTCSEPD) Health Plan Readiness and Member Transitions. Register in advance for this event Flier Presentation	
Thursday, July 30, 11:00 a.m. - 1:00 p.m.		Jacob's Law Training		Online on Zoom		Register in advance for this event Flier	
August 5, 2024, 8:30 a.m. - 4:30 p.m. AZ Time		Tribal Consultation - Former Foster Youth - Eligibility and Enrollment (YATI) Forums		Online on Zoom		<p>The Arizona Health Care Cost Containment System (AHCCCS) is requesting an amendment to the 1115 Research and Demonstration Waiver, Project Number 11-W-00275/9, to seek authority to extend eligibility for full Medicaid state plan benefits to Former Foster Youth (FFY) who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona. AHCCCS currently offers transitional medical care for children leaving foster care that are between the ages 18 to 26.</p> <p>AHCCCS presented the details about Arizona's Demonstration amendment proposal during a hybrid Tribal Consultation meeting and will share further details at two virtual public forum meetings. In addition, the Demonstration amendment proposal will be presented at the State Medicaid Advisory Committee (SMAC) meeting. Details regarding the public forum meetings can be found below:</p> <p>Register in advance for this event</p> <p>Flier</p>	

HOME	AHCCCS INFO	MEMBERS/APPLICANTS	PLANS/PROVIDERS	AMERICAN INDIANS	RESOURCES	FRAUD PREVENTION	CRISIS SERVICES
		August 29, 2024, Noon - 2:00 p.m. AZ Time		Public Forum #1- Former Foster Youth - Eligibility and Enrollment (YATI) Forums	Online on Zoom	<p>The Arizona Health Care Cost Containment System (AHCCCS) is requesting an amendment to the 1115 Research and Demonstration Waiver, Project Number 11-W-00275/9, to seek authority to extend eligibility for full Medicaid state plan benefits to Former Foster Youth (FFY) who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona. AHCCCS currently offers transitional medical care for children leaving foster care that are between the ages 18 to 26.</p> <p>AHCCCS presented the details about Arizona's Demonstration amendment proposal during a hybrid Tribal Consultation meeting and will share further details at two virtual public forum meetings. In addition, the Demonstration amendment proposal will be presented at the State Medicaid Advisory Committee (SMAC) meeting. Details regarding the public forum meetings can be found below:</p> <p>Register in advance for this event</p> <p>Flier</p>	
		September 12, 2024, 11:00 a.m. - 1:00 p.m. AZ Time		Public Forum #2- Former Foster Youth - Eligibility and Enrollment (YATI) Forums	Online on Zoom	<p>The Arizona Health Care Cost Containment System (AHCCCS) is requesting an amendment to the 1115 Research and Demonstration Waiver, Project Number 11-W-00275/9, to seek authority to extend eligibility for full Medicaid state plan benefits to Former Foster Youth (FFY) who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona. AHCCCS currently offers transitional medical care for children leaving foster care that are between the ages 18 to 26.</p> <p>AHCCCS presented the details about Arizona's Demonstration amendment proposal during a hybrid Tribal Consultation meeting and will share further details at two virtual public forum meetings. In addition, the Demonstration amendment proposal will be presented at</p>	

HOME	AHCCCS INFO	MEMBERS/APPLICANTS	PLANS/PROVIDERS	AMERICAN INDIANS	RESOURCES	FRAUD PREVENTION	CRISIS SERVICES
						<p>Tribal Consultation meeting and will share further details at two virtual public forum meetings. In addition, the Demonstration amendment proposal will be presented at the State Medicaid Advisory Committee (SMAC) meeting. Details regarding the public forum meetings can be found below:</p> <p>Register in advance for this event </p> <p>Flier </p>	
October 9, 2024, 1:00 p.m. – 3:00 p.m. AZ Time		State Medicaid Advisory Committee (SMAC) - Former Foster Youth - Eligibility and Enrollment (YATI) Forums		Online on Zoom	<p>The Arizona Health Care Cost Containment System (AHCCCS) is requesting an amendment to the 1115 Research and Demonstration Waiver, Project Number 11-W-00275/9, to seek authority to extend eligibility for full Medicaid state plan benefits to Former Foster Youth (FFY) who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona. AHCCCS currently offers transitional medical care for children leaving foster care that are between the ages 18 to 26.</p> <p>AHCCCS presented the details about Arizona's Demonstration amendment proposal during a hybrid Tribal Consultation meeting and will share further details at two virtual public forum meetings. In addition, the Demonstration amendment proposal will be presented at the State Medicaid Advisory Committee (SMAC) meeting. Details regarding the public forum meetings can be found below:</p> <p>Register in advance for this event </p> <p>Flier </p>		

APPENDIX C

Waiver Amendment Public Forum

Meeting Agendas, Slides and Comments





State Medicaid Advisory Committee (SMAC)

Quarterly Meeting
Wednesday, Oct 9, 2024
(VIRTUAL MEETING)
1:00 p.m. - 3:00 p.m.

(To Join by Web)

[SMAC Meeting Link](#)

Password: SMAC2024!

After you click the SMAC Meeting link, at the bottom of the landing page, it will say "**I'm not the meeting host, Join Meeting as an Attendee;**" please click that language to register.

(To Join by Phone)

+1669-444-9171

Webinar ID: 820 2219 9346 **Passcode:** SMAC2024!

Agenda

I. Attendance and Quorum Confirmation	Desiree Greene , Project Manager and SMAC Liaison
II. Welcome and AHCCCS Updates	Carmen Heredia , AHCCCS CEO
III. Health Directive Registry Update	Carla Sutter , Director of Healthcare Directives, Contexture
IV. Housing and Health Opportunities (H2O) Update	Elizabeth Da Costa , Housing Program Administrator
V. Young Adult Transitional Insurance (YATI) Update	Shreya Arakere , Federal Waiver and Evaluation Administrator
VI. Olmstead Update	Adam Robson , Employment Administrator
VII. SMAC Updates and Voting Session	Desiree Greene , Project Manager and SMAC Liaison
VIII. Call to the Public	Carmen Heredia , AHCCCS CEO
IX. Adjourn at 3:00 pm	All

SMAC Meetings

Per SMAC Bylaws, meetings are to be held the 2nd Wednesday of January, April, July and October.

All meetings will be held from 1:00 p.m. - 3:00 p.m. unless otherwise deemed necessary by the Director.

ASL interpretation and CART captioning services are available upon request. If you require these or other types of accommodations pursuant to the Americans with Disabilities Act (ADA), please contact the SMAC Liaison,

Desiree Greene at Desiree.Greene@azahcccs.gov or 480-714-3596.

AHCCCS QUARTERLY TRIBAL CONSULTATION MEETING AGENDA

Attendees: Tribal Leaders, Tribal Members, Indian Health Services, Tribal Health Programs Operated under P.L. 93-638 and Urban Indian Health Programs

Date and Time: Monday, August 5, 2024, 8:30 a.m. to 5:00 p.m.

Location: [Twin Arrows Casino Resort, Flagstaff, AZ](#) / Virtual

Webinar Registration Link: <https://bit.ly/3ScmSNR> (You will receive call-in information after registering for this meeting)

TIME	TOPIC	Presenter(s)	Reference Documents (please review ahead of TC)
8:00 AM – 8:30 AM	Breakfast Buffet	<i>Special Thanks to Tséhootsooí Medical Center for hosting TC!</i>	
8:30 AM – 8:35 AM	Zoom Controls	Desiree Greene <i>Division Project Manager & SMAC Liaison</i>	
8:35 AM – 8:40 AM	Invocation	Anderson Hoskie <i>Traditional Practitioner Tséhootsooí Medical Center</i>	
8:40 AM – 8:45 AM	Host Welcome	Robbie Whitehair <i>Interim CEO Tséhootsooí Medical Center</i>	
8:45 AM – 8:55 AM	Tséhootsooí Medical Center Historical Background	Dallas Ellsworth <i>Marketing Director Tséhootsooí Medical Center</i>	

8:55 AM – 9:10 AM	Land Acknowledgement, Tribal Consultation Notification & Introductions	Tribal Relations Team	<ul style="list-style-type: none"> • Tribal Delegate Form • Tribal Relations Public Calendar
9:10 AM – 9:35 AM	Opening Remarks & AHCCCS Updates	Carmen Heredia <i>AHCCCS CEO</i>	
9:35 AM – 10:00 AM	Tribal & UIO Leadership Open Mic	Tribal Leadership, UIO Leadership & Appointed Delegates	
BREAK (15 MINUTES)			
10:15 AM – 11:00 AM	Member Exploitation & Provider Fraud Updates <ul style="list-style-type: none"> • Recent Developments • Tribal Social Awareness Campaign • Signs of Progress • Next Phase of Humanitarian Response 	Marcus Johnson <i>CERA Deputy Director</i> Julia Corbett <i>Associate Content Director</i> <i>Accenture Interactive</i>	
11:00 AM – 11:25 AM	DFSM Updates	Leslie Short <i>DFSM Deputy Assistant Director</i>	
11:25 AM – 11:45 AM	Federal Relations Updates	Ruben Soliz <i>Federal Relations Section Lead & Health Policy Advisory</i> Shreya Arakere <i>Waiver Manager</i>	

11:45 AM – 12:15 PM	Traditional Healing Updates	Ruben Soliz <i>Federal Relations Section Lead & Health Policy Advisory</i>	
		Terrilyn Nez-Chee <i>Traditional Healing Workgroup Chair</i>	
LUNCH PROVIDED BY <i>Tséhootsooí Medical Center</i> (60 MINUTES)			
1:15 PM – 1:35 PM	Housing & Health Opportunities (H2O) Updates	Elizabeth Da Costa <i>Housing Administrator</i>	
1:35 PM – 1:55 PM	ALTCS EPD Readiness & Transition	Jakenna Lebsock <i>MCS Assistant Director</i>	
1:55 PM – 2:05 PM	Recovery Audit Program	Robin Clancy <i>OIG Audit Manager</i>	
BREAK (15 MINUTES)			
2:20 PM – 4:20 PM	Arizona Advisory Council on Indian Health Care (AACIHC) Updates and Town Hall <ul style="list-style-type: none"> • Introduction to AACIHC • AACIHC Strategic Plan Overview • Advisory Board Membership • Technical Support Series • AZHIP Survey Results • End of Legislative Session Report • American Indian Health - Area Health Education Center (AIH-AHEC) 	Dr. John Molina <i>AACIHC Director</i>	
		Alison Lovell <i>Business Operations Administrator</i>	
		Mckayla Keams <i>AACIHC Executive Project Coordinator</i>	
		Corey Hemstreet <i>AACIHC Legislative Specialist</i>	
		Tashina Machain <i>AACIHC Grants Coordinator</i>	

4:20 PM – 4:35 PM	Tribal Health Advisory Workgroup (THAW) Overview	Corey Hemstreet <i>AACIHC Legislative Specialist</i> Gerilene Haskon <i>ADHS Tribal Liaison</i> Christine Holden <i>AHCCCS Tribal Liaison</i>	<ul style="list-style-type: none"> • 9/18/24 Zoom Registration
4:35 PM – 4:55 PM	Open Discussion	Open Floor	
4:55 PM – 5:00 PM	Closing Remarks	Dr. John Molina <i>AACIHC Director</i> Carmen Heredia <i>AHCCCS CEO</i>	
5:00 PM	Announcements & Adjournment	AHCCCS Tribal Team	



Welcome to today's AHCCCS Community Forum

While you are waiting TEST YOUR AUDIO.
LISTEN FOR MUSIC.

You were automatically muted upon entry.
Please only join by phone or computer.

Please use the chat feature for questions or raise your hand.

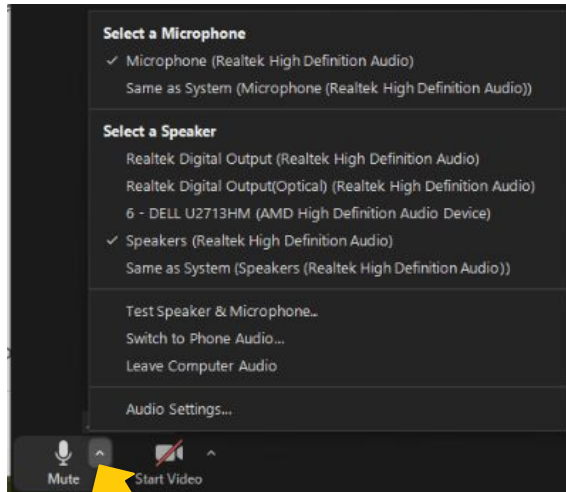
Thank you.



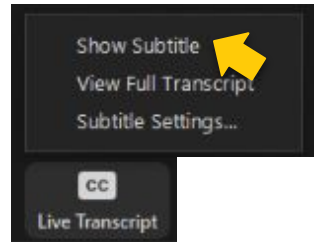
Zoom Webinar Controls

Navigating your bar on the bottom...

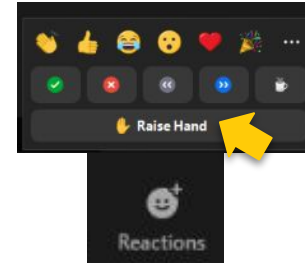
Audio Settings



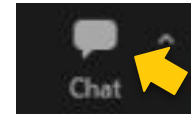
Turn on Closed Captioning



Raise Hand



Chat

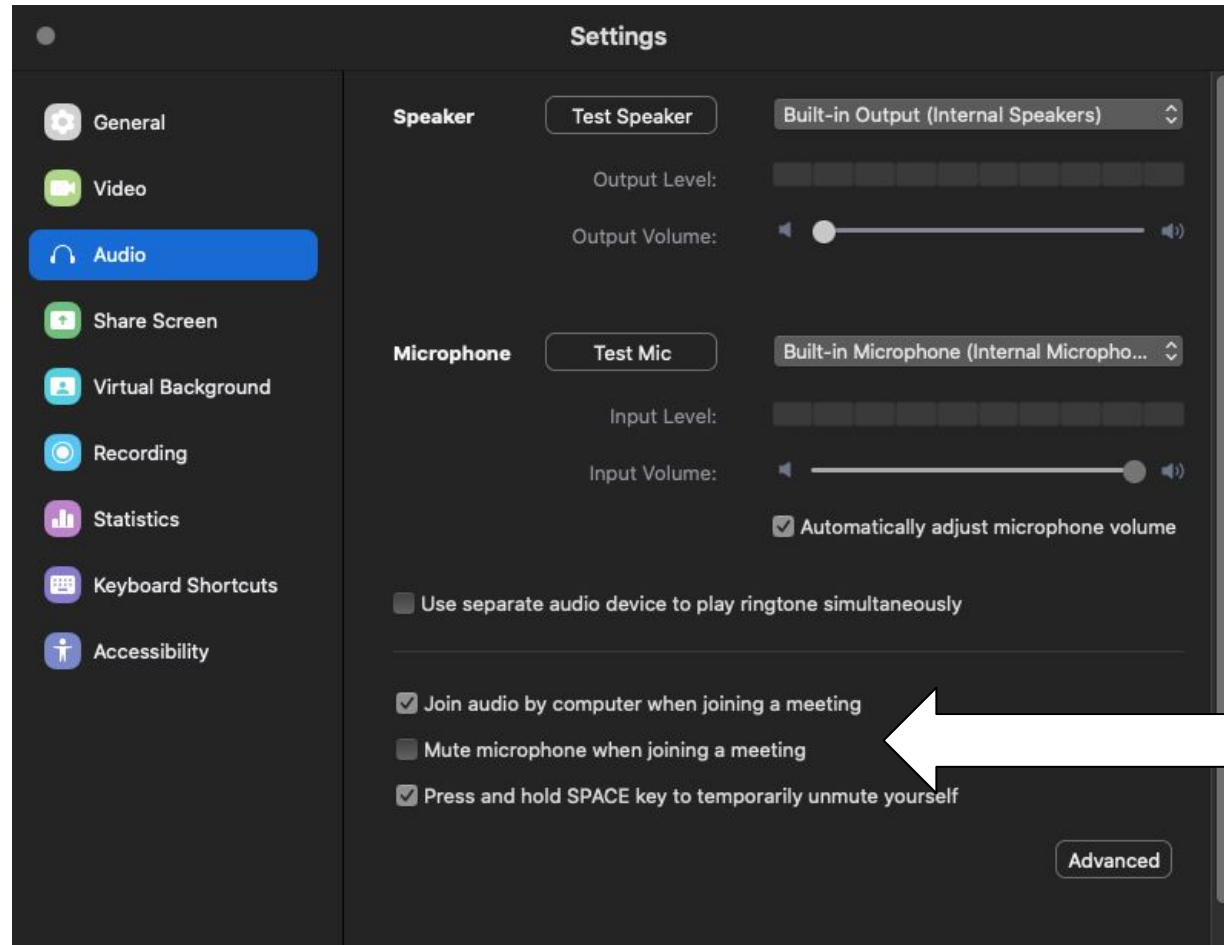


KEYBOARD SHORTCUTS TO RAISE HAND

Windows: Alt+Y to raise or lower your hand

Mac: Option+Y to raise or lower your hand

Audio Settings



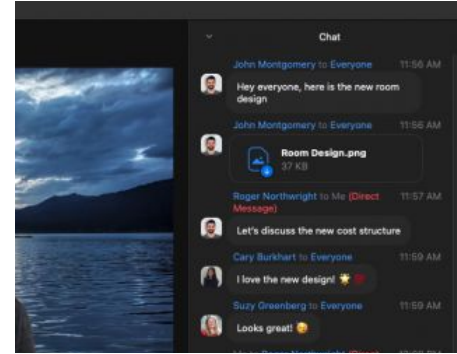
Webinar Tips



Mute your mic when you aren't speaking.



Limit background noise and distractions.



Use chat feature (or Q&A when available) to ask questions or share resources.

This Meeting Is Being Recorded

The recording shall be the sole property of AHCCCS and participation in this meeting indicates your waiver of any and all rights of publicity and privacy.

Please disconnect from this meeting if you do not agree to these terms.



Former Foster Youth - Eligibility and Enrollment

Shreya Arakere, Federal Waiver and Evaluation Administrator, AHCCCS



Section 1115 of the Social Security Act

- Allows states flexibility to design Demonstration projects that promote the objectives of the Medicaid program,
- Demonstration projects are typically approved for a five-year period and can be renewed every five years, and
- Must be budget neutral, meaning that federal spending under the waiver cannot exceed what it would have been in absence of the waiver.

1115 Waiver Renewal Approval

- On Oct.14, 2022 CMS approved Arizona's request for a five-year extension of its 1115 Waiver
 - October 14, 2022 through Sept. 30, 2027
- Continues:
 - Retroactive Eligibility
 - HCBS
 - Managed Care
 - ACC
 - ALTCS
 - CHP
 - ACC-RBHA



1115 Waiver Approval- New Initiatives

- Extended dental coverage for individuals receiving care in an IHS or 638 facility,
- Targeted Investments (TI) 2.0, and
- Housing and Health Opportunities (H2O) demonstration,
- Parents as Paid Caregivers (PPCG) Program,
- KidsCare Expansion.

Requests Subject to Continued Negotiation:

- Traditional Healing services,
- Pre-release services for individuals in federal, state, local and tribal correctional facilities.

Former Foster Youth - Eligibility and Enrollment

Former Foster Youth Eligibility and Enrollment - Amendment Request

- Waive the condition of eligibility in 42 CFR 435.608 requiring Medicaid beneficiaries to apply for other cash benefits for the Former Foster Youth (FFY) population.
- Relieve individuals who meet the statutory definition at 1902(a)(10)(A)(i)(IX) of the obligation to provide information about potentially liable third parties at renewal as a condition of eligibility.
- **Extend eligibility for full Medicaid state plan benefits to FFY who are under age 26, who turned 18 on or before December 31, 2022, who were in foster care under the responsibility of another state or tribe on the date of attaining 18 years of age, were enrolled in Medicaid on the date of aging out of foster care, and are now applying for Medicaid in Arizona.**

Former Foster Youth Eligibility and Enrollment - Current Program Overview

- Eligible Group: Youth who age out of foster care and are on Medicaid when they reach the age of majority.
- Eligibility Period: After aging out of care until reaching 26 years of age.
- Eligibility Requirements: AZ resident, identify and take action needed to get payments from TPL sources and cooperate with child support enforcement.
- This is otherwise known as the 'Young Adult Transitional Insurance (YATI)' group.

Former Foster Youth Eligibility and Enrollment: What is changing?

- The original request is in alignment with House Bill 2622 passed by Arizona's 55th Legislature
- Maintaining and extending eligibility: Eligibility will be automatically renewed without requiring additional information from the individual until the individual reaches 26 years of age . Provides eligibility under YATI for youth who aged out of care in other states before December 31, 2022.
- Effective Date: Effective upon CMS approval and completion of necessary operational and system modifications.

Former Foster Youth Eligibility and Enrollment- Eligibility Limitations

Coverage may end if:

- The individual reaches 26 years of age,
- The individual ceases to be a resident of the state,
- AHCCCS determines that eligibility was determined incorrectly because of agency error or fraud, abuse or perjury attributed to the individual, or
- The individual dies.

Former Foster Youth Eligibility and Enrollment - Future Steps

Upon CMS approval, the following operational and system modifications will be implemented:

1. System programming to stop generating requests for information related to TPL Policy revisions,
2. Training updates and staff training on policy change, and
3. Develop and deploy communication plan.

Public Comments

Public comments or written testimony may be submitted to AHCCCS via:

waiverpublicinput@azahcccs.gov

AHCCCS, % OOD-Division of Public Policy and Strategic Planning

801 E. Jefferson Street, MD 4200

Phoenix, AZ 85034

Comments are received through October 10, 2024



Resources

Former Foster Youth Amendment Resources

- More information on the Former Foster Youth Annual Automatic Renewal can be found at <https://www.azahcccs.gov/YATIWaiverRequest>.
- The web page includes a summary of Arizona's Demonstration amendment request & the schedule (dates and times) of public forums.

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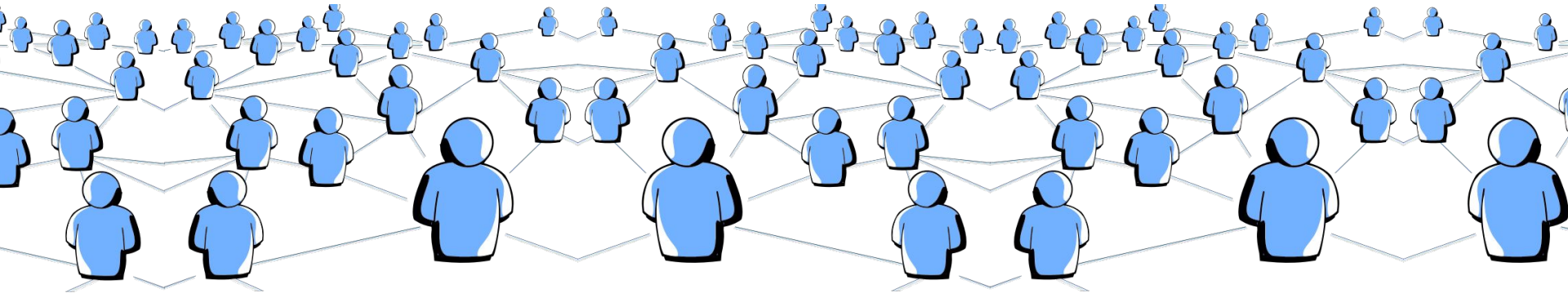
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Learn about AHCCCS' Medicaid Program on YouTube!



Watch our Playlist:

[Meet Arizona's Innovative Medicaid Program](#)

Other Resources - Quick Links

- AHCCCS [Waiver](#)
- AHCCCS [State Plan](#)
- AHCCCS [Grants](#)
- AHCCCS [Whole Person Care Initiative \(WPCI\)](#)
- AHCCCS [Office of Human Rights](#)
- AHCCCS [Office of Individual and Family Affairs](#)
- [Future RBHA Competitive Contract Expansion](#)

Open Discussion

AHCCCS Former Foster Youth Annual Automatic Renewal Waiver Amendment:
Community Forum Summary

AHCCCS held public forums regarding Arizona's Former Foster Youth Annual Automatic Renewal request. Feedback was solicited at several agency meetings including two demonstration amendment public forum meetings held online, which were attended by a variety of community stakeholders, as well as other public meetings such as the State Medicaid Advisory Committee (SMAC), and Tribal Consultation. The table below summarizes questions and comments from the public and the agency's responses.

Name/Organization	Stakeholder Questions and Comments	AHCCCS' Response
Matthew Jewett	<p>Discussed experience with CAA, shared personal story of a FFY member who did not receive notification of a renewal needed. This individual ended up having a 4 thousand dollar medical bill due to this problem. Shared that this proposal is very much needed.</p> <p>Two Questions:</p> <ol style="list-style-type: none">1. Does this new request affect the timeline of the YATI waiver request?2. Did CMS request this additional portion or was this AHCCCS generated?	<ol style="list-style-type: none">1. Discussed the considerable backlog of CMS with processing 1115 waiver requests. Hoping that this new addition will speed up the process due to the relation of 1902(e)(14)(a) waivers due to upcoming expiration.2. This was an AHCCCS decision in response to the Support Act requirement. Additional information was shared on the system side surrounding equity issues. We wanted to very much include those who qualify under the program now that were born prior to that date. Also discussed implementation issues and challenges that are involved with excluding a specific group.
Lorena Gonzales	<ol style="list-style-type: none">1. How will these waivers alleviate current issues for YATI youth?2. Is there any way to distinguish that it's a FFY member?	<ol style="list-style-type: none">1. Both of these waiver provisions benefit FFY in general. The first one is to remove barriers of removal. The population moves a lot, so the potential to have their eligibility renewed automatically without

		<p>needing to provide additional information is going to be important. We are not going to have kids losing coverage because they forget to respond. The other provision extends coverage which was extended through the Consolidated Appropriations Act. These were kids that faced the same barriers but were not included in FFY.</p> <p>2. What a provider might see on the verification screens is slightly different from what can be seen in the database. If this waiver is approved, the likelihood of FFY losing coverage would be reduced (with exception to the listed criterias).</p>
Margi Stenson	AHCCCS expiration date might show up to age 26	It does not show an end date, they are eligible until they are determined ineligible or changed to a different category.
Betty John	Who will verify foster care in another state or tribe?	Arizona's verification policy for FFY. Unless we have information that conflicts with their attestation, we are going to primarily rely on the customer to tell us that they aged out of foster care in another state or tribe. Our primary verification plan is to accept the attestation to the youth. We have found this anecdotal and these youths are far more likely to answer no than to answer yes that they aged out of foster care.
Abu Sillah	Are you eligible for the foster care program after 26?	For this program, no. But we do look to see if the individual qualifies for any other programs within AHCCCS.
Marlinda Clendon	For our children in tribal foster care what is the process to refer	In most cases the way to transition, we have the

	them to YATI?	identification of youth for foster care. There is a question on our application if the person aged out of foster care and was on medicaid at the time. Getting this question answered is the best way to set the factor and transition them successfully so that way we screen them to the YATI program. In the month the child is turning 18, getting that information through HEAPPLUS really helps ensure there are no gaps in coverage, no unnecessary work to ensure their coverage is ongoing.
Liz Mckenna	It is a good waiver to help Arizona children and foster care young adults.	

APPENDIX D

Waiver Amendment Public Comment Letter (2024)





Fwd: Public comment1 message

----- Forwarded message -----

From: **Natalie Higgins** [REDACTED]
Date: Thu, Sep 12, 2024 at 10:01 AM
Subject: Public comment
To: <waiverpublicinput@azahcccs.gov>

To whom it may concern,

I think that this amendment is a good idea and is vital to helping vulnerable young adults who have already been through so much, through no fault of their own. Making it easier for FFY to receive benefits is something we owe these resilient young adults. I desperately urge any body responsible for the successful passage of this bill to vote YES on this amendment.

Sincerely,

Natalie Higgins
[REDACTED]

NOTICE: This e-mail and any attachments to it may contain information that is PRIVILEGED and CONFIDENTIAL under State and Federal law and is intended only for the use of the specific individual(s) to whom it is addressed. This information may only be used or disclosed in accordance with law, and you may be subject to penalties under law for improper use or further disclosure of the information in this e-mail and its attachments. If you have received this e-mail in error, please immediately notify the person named above by reply e-mail, and then delete the one you received

APPENDIX E

Waiver Amendment Public Comment Letters (2023)



AHCCCS Former Foster Youth Annual Automatic Renewal Waiver Amendment: Community Forum Summary

AHCCCS held public forums regarding Arizona's Former Foster Youth Annual Automatic Renewal request. Feedback was solicited at several agency meetings including two demonstration amendment public forum meetings held online, which were attended by a variety of community stakeholders, as well as other public meetings such as the State Medicaid Advisory Committee (SMAC), and Tribal Consultation. The table below summarizes questions and comments from the public and the agency's responses.

Name/Organization	Stakeholder Questions and Comments	AHCCCS Response
Tyson Gillespie, Community Member	When this is effective, will it be retroactive for current YATI members?	If approved, the YATI waiver amendment will not be retroactive and will begin prospectively once an approval date is received. In addition, AHCCCS will need time to operationalize the program and make any necessary system changes.
Annie Anderson, Community Member	Once this is approved/implemented, who will provide the coverage for YATI members until they turn 26? Will they continue to receive coverage via a DCS plan, or will they get to choose from ACC plans?	Coverage will be administered through an ACC plan which members will be able to register for once they age out of the foster care group.
Betty John, Community Member	If this does go through, will it have an indicator or other information to identify YATI members if looked up through the AHCCCS system? Is this also inclusive for tribal youth and tribal foster care?	Yes, there is currently an indicator to track YATI individuals through an eligibility group for members who age out of foster care who are eligible for Medicaid. This will also be available and consistent for tribal members.
Cynthia Burr, AHCCCS Staff	Does this include kiddos who age out in group homes?	Yes, this proposal does include individuals who age out in group homes. However, this is also dependent on whether the individual qualifies for another

		eligibility category that may offer more coverage.
--	--	--

VISION

Every Arizonan has a safe, affordable place to call home.

MISSION

The Arizona Housing Coalition (AZHC) is a collaborative association that leads in the efforts to end homelessness and provide safe, affordable housing to all Arizonans.

Arizona Housing Coalition

Speaking Up for Home and Hope

Speaking Up for Home and Hope



Joanna Carr
Arizona Housing Coalition
1495 E Osborn Road
Phoenix
85014

February 23rd 2023

Arizona Health Care Cost Containment System
c/o Division of Community Advocacy and Intergovernmental Relations
801 E. Jefferson Street, MD 4200
Phoenix, AZ 85034

VIA ELECTRONIC SUBMISSION TO
waiverpublicinput@azahcccs.gov

Dear AHCCCS,

The Arizona Housing Coalition respectfully submits this public comment in strong support of AHCCCS' Arizona Section 1115 Waiver Draft Amendment Request: Former Foster Youth Annual Automatic Renewal. The Arizona Housing Coalition is a collaborative member association, leading the efforts to end homelessness and advocate for safe, affordable homes for all Arizonans. We are working to create an Arizona where housing stability is universal, and every man, woman, child and veteran has a safe, affordable place to call home. As an advocate for children's health and health equity in Arizona, the Arizona Housing Coalition is in full support of the draft Section 1115.

The waiver will promote continuity of health care and coverage for former foster youth ages 18 to 26 by requiring AHCCCS to automatically renew their eligibility for Young Adult Transitional Insurance (YATI). It will also simplify administration of YATI and reduce health disparities for former foster youth.

Youth who experience foster care have a high risk of chronic health conditions and health related social needs, including physical and behavioral health needs, adverse childhood experiences that can lead to serious health problems such as obesity, diabetes, heart disease, cancer, stroke, post-traumatic stress disorder, and depression and anxiety. To address these heightened health risks and to put foster youth on parity with youth who have not experienced foster care, The Affordable Care Act allows former foster youth to stay enrolled in Medicaid until age 26, regardless of income. But young adults who have aged out of the foster care system in Arizona frequently experience barriers and red tape that threaten their coverage.

VISION

Every Arizonan has a safe, affordable place to call home.

MISSION

The Arizona Housing Coalition (AZHC) is a collaborative association that leads in the efforts to end homelessness and provide safe, affordable housing to all Arizonans.

Arizona Housing Coalition

Speaking Up for Home and Hope

Speaking Up for Home and Hope

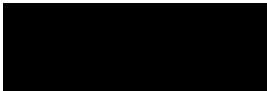


Although young people who turn age 18 in foster care are assisted by the Department of Child Safety (DCS) in initially enrolling in YATI, many lose their coverage at the point of renewal. Youth transitioning from foster care experience high rates of housing instability and enrollment. For many, renewal paperwork or other requests for information from the agency are mailed to an address that they no longer have any affiliation with after turning 18 - often a group home where they no longer live, or a DCS Case Manager's office address. Former foster youth cannot respond to letters they never receive and are often unaware that they've lost coverage until they show up at a doctor's office or emergency department in need of care, at which point they may have also missed the period they have to appeal the decision.

By allowing for the annual, automatic renewal of eligibility until age 26, the Draft Amendment will ensure continuity of health coverage for former foster youth. With the amendment, former foster youth between 18 and 26 years old will not have to worry about losing coverage due to red tape. The agency will still be able to move people to other categories as needed (for example, during pregnancy) and can disenroll the individual if they are enrolled in Medicaid in another state or if they choose to be. This will help ensure young people can stay connected to the health and mental health resources they need as they navigate adulthood.

We appreciate the opportunity to comment on, and offer support for, the Draft Amendment.

Sincerely,



Joanna Carr
Interim Executive Director
The Arizona Housing Coalition

Beth Rosenberg
[REDACTED]
[REDACTED]

Arizona Health Care Cost Containment System
c/o Division of Community Advocacy and Intergovernmental Relations
801 E. Jefferson Street, MD 4200
Phoenix, AZ 85034

VIA ELECTRONIC SUBMISSION TO waiverpublicinput@azahcccs.gov

Dear AHCCCS:

I respectfully submit this public comment in strong support of AHCCCS' Arizona Section 1115 Waiver Draft Amendment Request: Former Foster Youth Annual Automatic Renewal. I am currently retired but worked for more than four decades within Arizona state government and in a non-profit agency as an advocate for children and youth in the child welfare arena. Young people aging out of foster care was a primary concern and interest in my work. As an advocate for children's health and health equity in Arizona, I am in full support of the draft Section 1115.

The waiver will promote continuity of health care and coverage for former foster youth ages 18 to 26 by requiring AHCCCS to automatically renew their eligibility for Young Adult Transitional Insurance (YATI). It will also simplify administration of YATI and reduce health disparities for former foster youth.

Youth who experience foster care have a high risk of chronic health conditions and health related social needs, including physical and behavioral health needs, adverse childhood experiences that can lead to serious health problems such as obesity, diabetes, heart disease, cancer, stroke, post-traumatic stress disorder, and depression and anxiety. To address these heightened health risks and to put foster youth on parity with youth who have not experienced foster care, The Affordable Care Act allows former foster youth to stay enrolled in Medicaid until age 26, regardless of income. But young adults who have aged out of the foster care system in Arizona frequently experience barriers and red tape that threaten their coverage.

Although young people who turn age 18 in foster care are assisted by the Department of Child Safety (DCS) in initially enrolling in YATI, many lose their coverage at the point of renewal. Youth transitioning from foster care experience high rates of housing instability and enrollment. For many, renewal paperwork or other requests for information from the agency are mailed to an address that they no longer have any affiliation with after turning 18 - often a group home where they no longer live, or a DCS Case Manager's office address. Former foster youth cannot respond to letters they never receive and are often unaware that they've lost coverage until they show up at a doctor's office or emergency department in need of care, at which point they may have also missed the period they have to appeal the decision.

By allowing for the annual, automatic renewal of eligibility until age 26, the Draft Amendment will ensure continuity of health coverage for former foster youth. With the amendment, former foster

youth between 18 and 26 years old will not have to worry about losing coverage due to red tape. The agency will still be able to move people to other categories as needed (for example, during pregnancy) and can disenroll the individual if they are enrolled in Medicaid in another state or if they choose to be. This will help ensure young people can stay connected to the health and mental health resources they need as they navigate adulthood.

I appreciate the opportunity to comment on, and offer support for, the Draft Amendment.

Sincerely,

Beth Rosenberg
brosenbergaz@outlook.com

[REDACTED]

February 22, 2023

Arizona Health Care Cost Containment System
c/o Division of Community Advocacy and Intergovernmental Relations
801 E. Jefferson Street, MD 4200
Phoenix, AZ 85034

VIA ELECTRONIC SUBMISSION TO waiverpublicinput@azahcccs.gov

Dear AHCCCS:

Child & Family Resources, Inc. respectfully submits this public comment in strong support of AHCCCS' Arizona Section 1115 Waiver Draft Amendment Request: Former Foster Youth Annual Automatic Renewal. Our organization has a 53 year history providing child welfare and prevention services across Arizona. We care deeply about ensuring that all children have the opportunity to reach their full potential, and without health insurance, the odds are that much more challenging for youth aging out of the foster care system. We strongly support children's health and health equity in Arizona, and urge approval of this waiver.

The waiver will promote continuity of health care and coverage for former foster youth ages 18 to 26 by requiring AHCCCS to automatically renew their eligibility for Young Adult Transitional Insurance (YATI). It will also simplify administration of YATI and reduce health disparities for former foster youth.

Youth who experience foster care have a high risk of chronic health conditions and health related social needs, including physical and behavioral health needs, adverse childhood experiences that can lead to serious health problems such as obesity, diabetes, heart disease, cancer, stroke, post-traumatic stress disorder, and depression and anxiety. To address these heightened health risks and to put foster youth on parity with youth who have not experienced foster care, The Affordable Care Act allows former foster youth to stay enrolled in Medicaid until age 26, regardless of income. But young adults who have aged out of the foster care system in Arizona frequently experience barriers and red tape that threaten their coverage.

Although young people who turn age 18 in foster care are assisted by the Department of Child Safety (DCS) in initially enrolling in YATI, many lose their coverage at the point of renewal. Youth transitioning from foster care experience high rates of housing instability and enrollment. For many, renewal paperwork or other requests for information from the agency are mailed to an address that they no longer have any affiliation with after turning 18 - often a group home where they no longer live, or a DCS Case Manager's office address. Former foster youth cannot respond to letters they never receive and are often unaware that they've lost coverage until they show up at a doctor's office or emergency department in need of care, at which point they may have also missed the period they have to appeal the decision.

By allowing for the annual, automatic renewal of eligibility until age 26, the Draft Amendment will ensure continuity of health coverage for former foster youth. With the amendment, former foster youth between 18 and 26 years old will not have to worry about losing coverage due to red tape. The agency will still be able to move people to other categories as needed (for example, during pregnancy) and can disenroll the individual if they

are enrolled in Medicaid in another state or if they choose to be. This will help ensure young people can stay connected to the health and mental health resources they need as they navigate adulthood.

We appreciate the opportunity to comment on, and offer support for, the Draft Amendment.

Sincerely,



Eric Schindler, Ph.D.
President/CEO



3030 North Third Street | Suite 760 | Phoenix, AZ 85012
5049 East Broadway Boulevard | Suite 158 | Tucson, AZ 85711
www.azchildren.org | caa@azchildren.org | [REDACTED]

February 27, 2023

Arizona Health Care Cost Containment System
c/o Division of Community Advocacy and
Intergovernmental Relations
801 E. Jefferson Street, MD 4200
Phoenix, AZ 85034

**VIA ELECTRONIC SUBMISSION TO:
waiverpublicinput@azahcccs.gov**

Dear AHCCCS:

Children's Action Alliance (CAA) respectfully submits this public comment in strong support of AHCCCS' Arizona Section 1115 Waiver Draft Amendment Request: Former Foster Youth Annual Automatic Renewal. Through research, publications, media campaigns, and advocacy, CAA seeks to influence policies and decisions affecting the lives of Arizona children and their families on issues related to health, child abuse and neglect, early care and

education, budget and taxes, juvenile justice, children and immigration, and working families. CAA worked in partnership with Fostering Advocates Arizona, a group of transition-age foster youth, to pass House Bill 2622 which requires this amendment to Arizona's Section 1115 waiver. As an advocate for children's health and health equity in Arizona, Children's Action Alliance and Fostering Advocates Arizona are in full support of the draft amendment.

The waiver will promote continuity of health care and coverage for former foster youth ages 18 to 26 by requiring AHCCCS to automatically renew their eligibility for Young Adult Transitional Insurance (YATI). It will also simplify administration of YATI and reduce health disparities for former foster youth.

Youth who experience foster care have a high risk of chronic health conditions and health related social needs, including physical and behavioral health needs, adverse childhood experiences that can lead to serious health problems such as obesity, diabetes, heart disease, cancer, stroke, post-traumatic stress disorder, and depression and anxiety. To address these heightened health risks and to put foster youth on parity with youth who have not experienced foster care, The Affordable Care Act allows former foster youth to stay enrolled in Medicaid until age 26, regardless of income. But young adults who have aged out of the foster care system in Arizona frequently experience barriers and red tape that threaten their coverage.

Although young people who turn age 18 in foster care are assisted by the Department of Child Safety

(DCS) in initially enrolling in YATI, many lose their coverage at the point of renewal. Youth transitioning from foster care experience high rates of housing instability and enrollment. For many, renewal paperwork or other requests for information from the agency are mailed to an address that they no longer have any affiliation with after turning 18 - often a group home where they no longer live, or a DCS Case Manager's office address. Former foster youth cannot respond to letters they never receive and are often unaware that they've lost coverage until they show up at a doctor's office or emergency department in need of care, at which point they may have also missed the period they have to appeal the decision.

By allowing for the annual, automatic renewal of eligibility until age 26, the Draft Amendment will ensure continuity of health coverage for former foster youth. With the amendment, former foster youth between 18 and 26 years old will not have to worry about losing coverage due to red tape. The agency will still be able to move people to other categories as needed (for example, during pregnancy) and can disenroll the individual if they are enrolled in Medicaid in another state or if they choose to be. This will help ensure young people can stay connected to the health and mental health resources they need as they navigate adulthood. We appreciate the opportunity to comment on, and offer support for, the Draft Amendment.

Sincerely,

David Lujan
President and CEO

William E. Morris Institute for Justice

3707 North Seventh Street, Suite 300, Phoenix, Arizona 85014

Phone

Fax

February 27, 2023

waiverpublicinput@azahcccs.gov

Arizona Health Care Cost Containment System
Division of Community Advocacy and Intergovernmental Relations
801 E. Jefferson Street, MD 4200
Phoenix, Arizona 85034

Re: Comments to Arizona's Section 1115
Demonstration Waiver Request: Former
Foster Care Youth Annual Automatic
Renewal

Dear AHCCCS:

The William E. Morris Institute for Justice ("MIJ") is a non-profit organization dedicated to protecting the most basic civil and human rights of low-income Arizonans. As part of our work, we focus on issues affecting public benefit programs, such as Medicaid. Our advocacy ensures that Medicaid applicants and recipients receive fair eligibility determinations and redeterminations, and receive continuity of care and coverage where possible.

The Arizona Health Care Cost Containment System ("AHCCCS") is responsible for the processing of applications and recertifications for former foster care children under 26 years of age into the Young Adult Transitional Insurance ("YATI") category of Medicaid, after they age out of foster care. In 2022, the Arizona Legislature passed, and the Governor signed, House Bill 2622 ("HB 2622"). The bill, made subject to the approval of the Centers for Medicare and Medicaid Services ("CMS"), requires AHCCCS to automatically renew the eligibility of young adults in the YATI category without requiring additional information from the person, unless the person notifies AHCCCS that they moved out of Arizona or has provided information indicating that the person may qualify for Medicaid coverage under a different eligibility category. In compliance with HB 2622, AHCCCS requested from CMS a five-year Medicaid Section 1115 Demonstration Waiver to implement the bill. In its request, AHCCCS specifically asks CMS to "waive the condition of eligibility in 42 C.F.R. § 435.608 requiring

Medicaid beneficiaries to apply for other cash benefits for the Former Foster Youth population.”

MIJ submits these comments in support of AHCCCS’s proposed demonstration waiver. Our comments are detailed further below.

I. AHCCCS’s Proposed 1115 Demonstration Waiver Furthers the Purpose of the Medicaid Program

The Social Security Act grants the Secretary of the United States Department of Health and Human Services limited authority to waive the requirements of the Medicaid program, authorized by XIX of the Act. The Social Security Act allows the Secretary to grant a “[w]aiver of State plan requirements” in 42 U.S.C. § 1396a in the case of an “experimental, pilot, or demonstration project.” 42 U.S.C. § 1315(a). The Secretary may only approve a project which is “likely to assist in promoting the objectives” of Title XIX and may only “waive compliance with any of the requirements [of the Act] ... to the extent and for the period necessary” for the state to carry out the project. *Id.*

In addition, the record must show the Secretary considered the impact of the demonstration project on those the Medicaid Act was enacted to protect. *Newton-Nations v. Betlach*, 660 F.3d 370, 380 (9th Cir. 2011)(relying upon *Beno v. Shalala*, 30 F.3d 1057, 1069 (9th Cir. 1994)). Finally, several circuit courts have held that the objective of the Medicaid Act is to provide medical assistance to those who cannot afford it. *Gresham v. Azar*, 950 F.3d 93, 99-100 (D.C. Cir. 2020)(collecting cases).

In its request, Arizona states that two of the proposed waiver’s goals request is to “[p]romote continuity of care and coverage” and to “[m]ove toward administrative simplification.” The waiver, and the implementation of HB 2622, would promote the objectives of the Medicaid program, particularly recent amendments to the program, by eliminating unnecessary barriers to enrollment and ensuring continuous access to care for former foster care youth.

The Affordable Care Act

In 2014, the Affordable Care Act added former foster care children as a special group under mandatory eligibility for Medicaid. According to 42 U.S.C. § 1396a(a)(10)(A)(i)(IX), states “must” provide medical coverage through the Medicaid program to people:

(IX) who—

(aa) are under 26 years of age;

(bb) are not described in or enrolled under any of subclauses (I) through (VII) of this clause or are described in any of such subclauses but have income that exceeds the level of income applicable under the State plan for eligibility to enroll for medical assistance under such subclause;

(cc) were in foster care under the responsibility of the State on the date of attaining 18 years of age or such higher age as the State has elected under section 675(8)(B)(iii) of this title; and

(dd) were enrolled in the State plan under this subchapter or under a waiver of the plan while in such foster care;

This means that individuals who age out of foster care are presumptively eligible for Medicaid coverage through the former foster care category until they turn 26 years old. There are no income eligibility or asset test requirements for this category. In Arizona, this category is known as the YATI category. Pursuant to the statutory language set forth above, and – specifically – the mandatory term *must* used in the prefatory clause of 42 U.S.C. § 1396a(a), the YATI category is a mandatory Medicaid coverage category for former foster youth.

The Final Rule of the Affordable Care Act

In addition, the 2016 final rule of the Affordable Care Act implemented provisions of the law that expanded access to Medicaid health coverage. Final Rule of the Affordable Care Act, 81 Fed. Reg. 86382 (Jan. 20, 2017). One of the added provisions was 42 C.F.R. § 435.150, which implemented 42 U.S.C § 1396a(a)(10)(A)(i)(IX). *Id.* at 86451-52. The federal regulation, 42 C.F.R. § 435.150, varies slightly from the statute discussed above and requires medical coverage for former foster care youth under age 26, who age out of care, and “[a]re not eligible **and** enrolled for mandatory coverage under §§ 435.110 through 435.145.” 42 C.F.R. § 435.150 (emphasis added). This change has significant consequences on the enrollment process for former foster care youth, which the preamble of the final rule discusses.

The preamble of the final rule does not require that a screening process occur before an individual is enrolled in YATI, but it does make clear that persons aging out of

foster care should be evaluated for mandatory categories, including the former foster care category, before their Medicaid coverage can be terminated:

Under § 435.916(f)(1) of the current regulations, states may not determine a current beneficiary to be ineligible before considering all bases of eligibility. In the case of individuals aging out of foster care on or after January 1, 2014 (the effective date for coverage under the former foster care group), this means that states cannot terminate Medicaid eligibility of an individual in foster care who attains age 18 or otherwise ages out of their foster care status without determining first whether such individual retains eligibility under another eligibility group. Individuals who age out or leave foster care may be eligible under the mandatory group for children under § 435.118, as a disabled individual under § 435.120 or § 435.121, as a pregnant woman under § 435.116, or as a parent or other caretaker relative under § 435.110.

Final Rule of the Affordable Care Act, 81 Fed. Reg. at 86406.

However, if the information necessary to enroll individuals in the other mandatory categories is unavailable, the preamble directs states to automatically enroll individuals in the former foster care category:

If the individual is eligible for the former foster care group and either the state determines the individual is ineligible for these other mandatory groups **or does not have sufficient information to determine eligibility under the other groups, the state should transition the individual to the former foster care group without interruption in Medicaid coverage or need to submit additional information.** *Id.* (emphasis added).

Under this direction, the state should automatically place the youth in the YATI category if it does not have sufficient evidence to place the foster care youth in another category without first requesting the information or engaging in further investigation. This analysis is specifically endorsed in the preamble and advances the plain meaning of the applicable statutory language enacted by Congress, evincing an intent to mandate Medicaid coverage for former foster youth.

Further, the preamble provides additional direction on how former foster care youth should be transitioned into the former foster care youth category:

We recommend the use of automated transition of individuals to the former foster care group within a state, and we remind states of the availability of enhanced federal funding for Medicaid eligibility and enrollment systems (“90/10” funding) to support such automated systems. *Id.*

The SUPPORT Act

In October 2018, Congress passed Public Law 115-271, the Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities (“SUPPORT”) Act. 132 Stat. 3894 (2018). Although the law was intended to primarily address the opioid epidemic, the SUPPORT Act also addressed existing issues with the former foster care youth category, including those discussed in the 2016 final rule of the Affordable Care Act, and makes several amendments to existing law. Pub. L. No. 115-271, § 1001, 132 Stat. at 3901-3903.

The SUPPORT Act addressed the screening and verification issues for foster care youth by amending the language in 42 U.S.C. § 1396a(a)(10)(A)(i)(IX). The revised statute now reflects the language in 42 C.F.R. § 435.150, and provides that former foster care youth, who are under age 26, have aged out of the care, and “are not described in *and* enrolled under” any other subclauses are eligible for medical coverage under the former foster care category. *Id.* at 3902 (emphasis added). Thus, these youth are eligible for Medicaid through the YATI program unless they are already enrolled in another Medicaid category. With this change, states cannot engage in hierarchical screening processes with this particular mandatory coverage group.

The SUPPORT Act’s revisions went into effect on January 1, 2023, but only applies to “foster youth who attain 18 years of age on or after January 1, 2023.” This means that the original eligibility requirements for the former foster care group, including any screening processes, will continue to apply to youth who turned 18 before January 1, 2023.¹ CMS, however, encourages states to submit a new section 1115 demonstration or an amendment to an existing 1115 demonstration to apply the new eligibility

¹ Center Medicaid and Medicare Services, SHR# 22-003 RE: Coverage of Youth Formerly in Foster Care in Medicaid (Section 1002(a) of the SUPPORT Act). (Dec. 16, 2022), <https://www.medicaid.gov/federal-policy-guidance/downloads/sho22003.pdf>.

requirements to all former foster care youth, even if they turned 18 prior to January 1, 2023.²

Arizona's proposed 1115 demonstration waiver request to automatically renew the eligibility of former foster care youth is in line with the objectives of the Medicaid program to ensure healthcare coverage for those who cannot afford it. The demonstration waiver request further complies with the objectives of the Affordable Care Act's amendments to the Medicaid program and accompanying guidance for implementing those changes. Finally, the demonstration waiver request is in line with the SUPPORT Act's intentions and follows CMS's guidance.

II. The Proposed Waiver Will Help Reduce Eligibility Churn for Former Foster Care Youth

Arizona's proposed 1115 demonstration waiver states that a goal of the waiver is to "[r]educe unnecessary eligibility churn." "Churn" is the temporary loss of Medicaid coverage in which benefit recipients disenroll and then re-enroll within a short period. Evidence indicates that Medicaid recipients who experience churn are more likely to experience difficulties in getting medical care and are more likely to end up in the hospital with a preventable condition.³ Churn can occur for many reasons, but churn commonly occurs during the recertification process when a recipient fails to provide additional information necessary to determine eligibility.⁴

Beginning in 2017, MIJ became concerned that many former foster care children were not being properly enrolled in the YATI category and/or were being improperly disenrolled from the category at recertification. After numerous public records requests, letters and telephone calls with AHCCCS, we came to understand that eligibility workers were not enrolling or re-enrolling youth in the YATI category until they determined the youth's eligibility for other mandatory Medicaid categories.

² *Id.*

³ Bradley Coalto et al., *Medicaid Enrollment Churn and Implications for Continuous Coverage Policies*, Kaiser Family Foundation, <https://www.kff.org/medicaid/issue-brief/medicaid-enrollment-churn-and-implications-for-continuous-coverage-policies/#:~:text=The%20temporary%20loss%20of%20Medicaid,occurs%20for%20a%20several%20reasons..>

⁴ *Id.*

The consequence of this practice was that many qualified YATI applicants' enrollment or recertification were stalled, or even denied, simply because there was a possibility the youth might fit into another Medicaid eligibility category. If that other category required additional information, such as income, and that information was not obtained, then the youth's YATI application may have been denied. A recipient's coverage could similarly be denied at recertification.

By automatically renewing the Medicaid eligibility of former foster care youth, the proposed waiver and implementation of HB 2622 will help to greatly reduce churn for this eligibility category. It will also eliminate the practice of considering irrelevant information to stall, or to deny, YATI enrollment or recertification to a population for whom Medicaid coverage is mandatory by definition and statutory command.

III. The Proposed Waiver Will Help Reduce Health Disparities for Former Foster Care Youth

Arizona also states that a goal of automatically renewing Medicaid coverage for former foster care youth is to “[r]educe health disparities for the target population.” Children in foster care have documented increased health needs compared to children not in foster care.⁵ Children in foster care are often exposed to many adverse experiences during childhood, including poverty, abuse, neglect, domestic violence, substance abuse, and placement changes, and that exposure can lead to a wide array of health needs.⁶ Those health problems and increased needs persist to young adulthood, long after the youth has left foster care.⁷ Former foster care youth experience higher rates of many chronic health issues, such as obesity, diabetes, hypertension, heart disease, and asthma.⁸

⁵ The American Academy of Pediatrics, *Health Care Issues for Children and Adolescents in Foster Care and Kinship Care*, Pediatrics (2015); 136(4):e1131-e1140, <https://publications.aap.org/pediatrics/article/136/4/e1131/73819/Health-Care-Issues-for-Children-and-Adolescents-in->.

⁶ *Id.*

⁷ Kym R. Ahrens et al., *Health Outcomes in Young Adults from Foster Care and Economically Diverse Backgrounds*, Pediatrics (2014); 134(6):1067-1074, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4243069/>.

⁸ *Id.*

In addition, former foster care youth have higher occurrences of mental health issues and experience other hardships, such as homelessness or housing instability.⁹

The proposed waiver will help ensure that former foster care youth have continuity of coverage and care. This will ensure that former foster care youth health needs are met and help decrease health inequities and other hardships for these young adults.

IV. Arizona's Proposed 1115 Demonstration Waiver Should Include an Outreach Component

As part of its proposed demonstration waiver, we propose that Arizona include a robust outreach plan to former foster care youth who are no longer enrolled in Medicaid under the YATI category, but based on information that AHCCCS has available, may still be eligible for benefits. Due to the screening processes used by AHCCCS, many of these youth may have been removed from Medicaid enrollment for failure to respond to the agency or to provide requested information. AHCCCS must reevaluate these cases, reenroll eligible youth, and notify eligible youth of these changes.

Further, to ensure that disenrolled former foster care youth are aware of Arizona's changes in enrollment and recertification pursuant to the demonstration waiver, AHCCCS must engage in a state-wide publicity campaign. The campaign should target areas and industries most likely to be frequented by young adults 18-26 years of age. Some examples include community colleges, trade schools, job fairs, shelters providing services to unhoused individuals, community centers, advocate organizations for youth, and universities.

Including a robust outreach plan to former foster care youth throughout the state will further the purpose of the Medicaid program and help ensure that a population that is subject to vulnerabilities receive the medical coverage that they are entitled to receive.

Conclusion

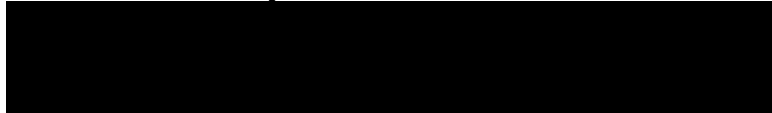
For all the above reasons, the William E. Morris Institute for Justice supports Arizona's proposed 1115 demonstration waiver. The demonstration waiver and the implementation of HB 2622 will promote the objectives of the Medicaid program and

⁹ Amy Dworsky et al., *Homelessness During the Transition from Foster Care to Adulthood*, Am J. Public Health (Dec. 2013); 103 (Suppl 2): S318-S323, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3969135/>.

AHCCCS
February 27, 2023
Page 9

will positively impact former foster care youth by ensuring their healthcare needs are met.

Sincerely,

A large black rectangular redaction box covering the signature area.

Brenda Muñoz Furnish

Arizona Chapter

INCORPORATED IN ARIZONA

American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN®



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Marisa Werner, MD, FAAP

Programs

Arizona Center for Emotional and
Behavioral Health

Arizona Child Fatality Review

Arizona Pediatric Quality
Improvement Institute

Arizona Pediatric COVID-19 Training
Center

Medical Services Project

Pediatric Prepared Emergency Care

Reach Out and Read Arizona

February 28, 2023

Arizona Health Care Cost Containment System
c/o Division of Community Advocacy and Intergovernmental Relations
801 E. Jefferson Street, MD 4200
Phoenix, AZ 85034

Dear AHCCCS:

The Arizona Chapter of the American Academy of Pediatrics (AzAAP) respectfully submits this public comment in strong support of AHCCCS' Arizona Section 1115 Waiver Draft Amendment Request: Former Foster Youth Annual Automatic Renewal.

The AZAAP is the largest professional association of pediatric physicians and other pediatric health care providers in Arizona and is a chapter of the American Academy of Pediatrics, an organization of 67,000 primary care pediatricians, pediatric medical subspecialists and pediatric surgical specialists dedicated to the health, safety and well-being of infants, children, adolescents, and young adults. As advocates for children's health and health equity in Arizona, we believe that all children, adolescents, and young adults from birth to the age of 26 years must have access to high-quality health care. This waiver will promote continuity of health care and coverage for former foster youth ages 18 to 26 by requiring AHCCCS to automatically renew their eligibility for Young Adult Transitional Insurance (YATI). It will also simplify administration of YATI and reduce health disparities for former foster youth.

Youth who experience foster care commonly have chronic health conditions including physical and behavioral health needs. These serious health problems include obesity, diabetes, physical disabilities, post-traumatic stress disorder, depression, and anxiety. To address these health problems, the Affordable Care Act allows former foster youth to stay enrolled in Medicaid until age 26, regardless of income.

Although young people who turn age 18 in foster care are assisted by the Department of Child Safety (DCS) in initially enrolling in YATI, these young people face multiple barriers that threaten their continuous access to health care coverage. Many of them lose their coverage at the point of renewal because of their high rates of housing instability and lack of experience in completing the required paperwork for renewal. For example, renewal paperwork or other requests for information often is mailed to a group home where they no longer live or to a caseworker who is no longer working with the young adult.

Arizona Chapter

INCORPORATED IN ARIZONA

American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN®



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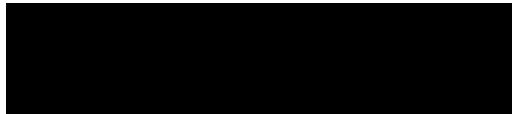
Pediatric Prepared Emergency Care

Reach Out and Read Arizona

By allowing for the annual, automatic renewal of eligibility until age 26, the Draft Amendment will ensure continuity of health coverage for these former foster youth. With the amendment, former foster youth between 18 and 26 years old will not have to worry about losing coverage due to their unstable housing and lack of experience handling the paperwork of insurance renewal. The agency will still be able to move people to other categories as needed (for example, during pregnancy) and can disenroll the individual if they are enrolled in Medicaid in another state. Automatic renewal will help ensure these young people can stay connected to the health and mental health resources they need.

We appreciate the opportunity to comment on, and offer support for, the Draft Amendment.

Sincerely,



Mary Ellen Rimsza, MD, FAAP
AzAAP Advocacy Committee Chair

Arizona Chapter

INCORPORATED IN ARIZONA

American Academy of Pediatrics

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Medical Services Project

Pediatric Prepared Emergency Care

Reach Out and Read Arizona

Sincerely,

[signature]

CC or Enclosures:



February 27, 2023

Arizona Health Care Cost Containment System
c/o Division of Community Advocacy and Intergovernmental Relations
801 E. Jefferson Street, MD 4200
Phoenix, AZ 85034

VIA ELECTRONIC SUBMISSION TO waiverpublicinput@azahcccs.gov

Dear AHCCCS:

The Arizona Council of Human Service Providers respectfully submits this public comment in strong support of AHCCCS' Arizona Section 1115 Waiver Draft Amendment Request: Former Foster Youth Annual Automatic Renewal.

The Arizona Council of Human Service Providers is a 501(c)(6) membership association. We provide advocacy and support to over 100 behavioral health and substance use, child welfare, juvenile justice, and whole person integrated health care organizations across Arizona. These organizations range in size and scope and employ over 30,000 staff throughout more than 900 facilities and serve approximately 1 million community members across the state. As an advocate for children's health and health equity in Arizona, we are in full support of the draft Section 1115.

The waiver will promote continuity of health care and coverage for former foster youth ages 18 to 26 by requiring AHCCCS to automatically renew their eligibility for Young Adult Transitional Insurance (YATI). It will also simplify administration of YATI and reduce health disparities for former foster youth.

Youth who experience foster care have a high risk of chronic health conditions and health related social needs, including physical and behavioral health needs, adverse childhood experiences that can lead to serious health problems such as obesity, diabetes, heart disease, cancer, stroke, post-traumatic stress disorder, and depression and anxiety. To address these heightened health risks and to put foster youth on parity with youth who have not experienced foster care, The Affordable Care Act allows former foster youth to stay enrolled in Medicaid until age 26, regardless of income. But young adults who have aged out of the foster care system in Arizona frequently experience barriers and red tape that threaten their coverage.

Although young people who turn age 18 in foster care are assisted by the Department of Child Safety (DCS) in initially enrolling in YATI, many lose their coverage at the point of renewal. Youth transitioning from foster care experience high rates of housing instability and enrollment.



ARIZONA COUNCIL

OF HUMAN SERVICE PROVIDERS

For many, renewal paperwork or other requests for information from the agency are mailed to an address that they no longer have any affiliation with after turning 18 - often a group home where they no longer live, or a DCS Case Manager's office address. Former foster youth cannot respond to letters they never receive and are often unaware that they've lost coverage until they show up at a doctor's office or emergency department in need of care, at which point they may have also missed the period they have to appeal the decision.

By allowing for the annual, automatic renewal of eligibility until age 26, the Draft Amendment will ensure continuity of health coverage for former foster youth. With the amendment, former foster youth between 18 and 26 years old will not have to worry about losing coverage due to red tape. The agency will still be able to move people to other categories as needed (for example, during pregnancy) and can disenroll the individual if they are enrolled in Medicaid in another state or if they choose to be. This will help ensure young people can stay connected to the health and mental health resources they need as they navigate adulthood.

We appreciate the opportunity to comment on, and offer support for, the Draft Amendment.

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