DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop S2-25-26
Baltimore, Maryland 21244-1850

State Demonstrations Group

November 6, 2026

Josh Moore
Director
MO HealthNet
Missouri Department of Social Services
615 Howerton Court
P.O. Box 6500
Jefferson City, MO 65102-6500

Dear Director Moore:

The Centers for Medicare & Medicaid Services (CMS) completed its review of the Missouri Former Foster Care Youth Evaluation Design, which is required by the Special Terms and Conditions (STCs), specifically, STC #6.2 "Evaluation Design" of Missouri's section 1115 demonstration, "Missouri Former Foster Care Youth" (Project No: 11-W-00367/7), effective through December 31, 2030. CMS has determined that the Evaluation Design, which was submitted on August 19, 2026, meets the requirements set forth in the STCs and our evaluation design guidance, and therefore approves the state's Former Foster Care Youth Evaluation Design.

Program Integrity
CMS has added the approved Evaluation Design to the demonstration's STCs as Attachment A. A copy of the STCs, which includes the new attachment, is enclosed with this letter. In accordance with 42 CFR 431.424, the approved Evaluation Design may now be posted to the state's Medicaid website within 30 days. CMS will also post the approved Evaluation Design as a standalone document, separate from the STCs, on Medicaid.gov.

Please note that an Interim Evaluation Report, consistent with the approved Evaluation Design, is due to CMS one year prior to the expiration of the demonstration, or at the time of the extension application, if the state chooses to extend the demonstration. Likewise, a Summative Evaluation Report, consistent with this approved design, is due to CMS within 18 months of the end of the demonstration period. In accordance with 42 CFR 431.428 and the STCs, we look forward to receiving updates on evaluation activities in the demonstration monitoring reports.

States are responsible for following all applicable federal law and regulations when they claim and use federal Medicaid funds and must fully comply with all applicable Medicaid statutes and regulations under a section 1115 demonstration, except where specific provisions have been expressly waived or identified as not applicable for that demonstration. This obligation includes all requirements in Title XIX of the Social Security Act and implementing regulations governing

provider screening and enrollment activities, pre- and post-payment review claiming, payment methodologies and rate-setting, utilization controls, and program integrity including processes to identify, investigate, and refer suspected fraud, and methods to receive complaints and identify questionable practices. States must maintain effective systems and safeguards to prevent, detect, and address any fraud, waste, or abuse (FWA) in the delivery of and payment for Medicaid services, including referrals to law enforcement when appropriate.

States should have heightened monitoring and oversight mechanisms in place featuring robust internal controls to identify and remediate all vulnerabilities (including, but not limited to, FWA and beneficiary access issues) inherent in service areas approved as part of a demonstration. At any time, CMS may request that the state provide a plan detailing the state's systems and safeguards to prevent, detect, and address any FWA relative to this demonstration. Failure to meet program integrity obligations under federal statutes and regulations or under the terms and conditions of this demonstration approval may result in compliance actions or other enforcement measures that could include requirements to develop and implement corrective action plans, withholdings, deferrals, disallowances, and termination of demonstration authority.

We appreciate our continued partnership with Missouri on the Missouri Former Foster Care Youth section 1115 demonstration. If you have any questions, please contact your CMS demonstration team.

Sincerely,

DANIELLE DALY -S

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Date: 2026.11.06 11:04:22 -05'00'

Danielle Daly
Director
Division of Demonstration Monitoring and Evaluation

cc: Rhonda Gray, State Monitoring Lead, CMS Medicaid and CHIP Operations Group

1115 Former Foster Care Youth (FFCY) Waiver: Evaluation Design

Project Number: 11-W00367/7
Approval Date: March 13, 2026
Evaluation Period: January 1, 2026 – December 31, 2030

I. Background Information:

The purpose of the initial demonstration, the Missouri Former Foster Care Youth (FFCY) Section 1115 Demonstration waiver (Project Number: 11-W-00367/7), approved June 2, 2021, through December 31, 2025, is to provide Medicaid coverage to Missouri residents who are former foster care youth under age twenty-six (26), were in foster care under the responsibility of another state for at least six (6) months as of the date they turned age eighteen (18), and were enrolled in Medicaid while they were in foster care. The expected impact of the demonstration is that Missouri will maintain coverage for this population, including former foster care youth, increase and strengthen overall coverage of former foster care youth in Missouri, and improve health outcomes for these youth.

The amended FFCY waiver, approved June 10, 2022, through December 31, 2025, included demonstration goals for a population that included individuals in foster care, adoption subsidy recipients, those under age 26, and youth in the care of the Division of Youth Services to be enrolled in a single specialty health plan. Since this population receives its services under a 1915(b) waiver, they are being evaluated under existing measures for that waiver.

On April 9, 2025, the State submitted an application to extend the FFCY demonstration waiver to ensure that coverage remained available to current and prospective demonstration members. On November 17, 2025, the Centers for Medicare & Medicaid Services (CMS) approved a temporary extension of the State's section 1115 demonstration, entitled the Missouri Former Foster Care Youth Section 1115 Demonstration (Project Number: 11-W-00367/7).

On March 13, 2026, CMS approved the State's request to extend the Missouri Former Foster Care Youth Section 1115 Demonstration (Project Number: 11-W-00367/7). With this approval, the demonstration received a temporary extension period, January 1, 2026, through March 31, 2026, and the current demonstration is now effective April 1, 2026, through December 31, 2030. Upon that date, unless extended or otherwise amended, the demonstration will terminate.

The demonstration goals that will be tested are:

a. Maintain access to Medicaid coverage for former foster care youth who meet the eligibility criteria.

b. Improve health outcomes for the demonstration population.

The demonstration's core evaluation questions, hypotheses, data sources, and analytical approaches are provided in the table below.

II. Design Table:

Evaluation Questions	Evaluation Hypotheses	Measures	Data Sources	Analytic Methods
Demonstration Goal: Maintain access to Medicaid coverage for former foster care youth who meet the eligibility criteria.				
Does the demonstration population have access to continuous coverage?	The demonstration population will be enrolled continuously for 12 months.	Number of members continuously enrolled/Total number of members	Administrative - Enrollment Data	Descriptive statistics (frequency and percentage)
How did the demonstration population utilize health services?	The member will have access to needed health services.	- PCP Visits for demonstration waiver (DW) members/total members - ED Visits for DW members/total members	Administrative - Encounter Claims	Descriptive statistics (frequencies and percentages)

		- Inpatient hospitalization for DW members/total members - BH Visits (Outpatient) for DW members/total members		
Demonstration Goal: Improve health outcomes for the demonstration population				
Did health outcomes improve for the demonstration population?	The member's health outcomes will improve.	- Number of DW members with appropriate follow-up care for hospitalizations (physical and/or mental illness) / Total number of members with hospitalization - Total number of DW members with appropriate medication management for people with asthma /Total number of members on medication for asthma - Total number of DW members with an annual preventive visit / Total number of members - Total number of DW members with a cervical cancer screening / Total number of members eligible for cervical cancer screening.	Administrative – Encounter/HEDIS data FUH (MI) Follow-up within 7 days of discharge from Inpatient Hospital AMR W30 WCV CCS	Descriptive Statistics

III. Methodology:

a. Evaluation Design: The evaluation design will utilize a post-only assessment. The timeframe for the post-only period will begin when the demonstration begins and end when the demonstration ends.

b. Data Sources: Missouri will pull enrollment data, disenrollment data and claims data that will be collected through administrative data. The State is not aware of any limitations of the data.

c. Analytic Methods: Missouri will use quantitative methods to analyze the data. For the hypotheses above, the State will use descriptive statistics.

IV. Methodological Limitations:

a. The State anticipates up to 10 enrolled individuals to be covered under this demonstration annually. Due to the small demonstration population, the State would not be able to pull meaningful comparisons using baseline data or a comparison group. Therefore, Missouri's evaluation design does not include baseline data or a comparison group. The State will capture all proposed metrics for the demonstration population.

b. The State anticipates the demonstration's objective to increase and strengthen overall coverage for FFCY by ensuring continued Medicaid coverage for out-of-state FFCY who would otherwise face a coverage gap.

V. Evaluation Budget:

a. Per consultation with CMS, the Independent Evaluator requirement specified in STC 6.1 does not apply to this demonstration. This is due to the low number of demonstration participants, both experienced and anticipated, which will not support a rigorous evaluation envisioned by the independent evaluator requirement otherwise applied to section 1115 demonstrations.

b. Per STC 6.5, the State will provide an evaluation budget that includes the estimated expenses for each demonstration year. Additionally, the State will include a breakdown of estimated staff, administrative, and other costs for various evaluation

activities, such as survey development, data collection, and report writing. If the State plans to use State staff to conduct the evaluation, that will be noted in the budget along with the approximate amount of resources to be utilized.

EVALUATION BUDGET
FFCY 1115 Waiver 11-W-00367/7
Evaluation Budget 2026 – 2030

ESTIMATED	DY6 01/01/2026 - 12/31/2026	DY7 01/01/2027 - 12/31/2027	DY8 01/01/2028 - 12/31/2028	DY9 01/01/2029 - 12/31/2029	DY10 01/01/2030 - 12/31/2030	
Staff Cost per Position						Total 5yr Waiver:
- Policy, Contracts,	$3,500.00	$3,500.00	$3,500.00	$3,500.00	$3,500.00	$17,500.00
- Quality Oversight M	$1,500.00	$1,500.00	$1,500.00	$1,500.00	$1,500.00	$7,500.00
- Rate Setting Manage	$750.00	$750.00	$750.00	$750.00	$750.00	$3,750.00
- Program Specialist	$4,000.00	$4,000.00	$4,000.00	$4,000.00	$4,000.00	$20,000.00
- Research Data Analy	$1,000.00	$1,000.00	$1,000.00	$1,000.00	$1,500.00	$5,500.00
Total Estimated Cost:	$10,750.00	$10,750.00	$10,750.00	$10,750.00	$11,250.00	**$54,250.00**

ESTIMATED	DY6 01/01/2026 - 12/31/2026	DY7 01/01/2027 - 12/31/2027	DY8 01/01/2028 - 12/31/2028	DY9 01/01/2029 - 12/31/2029	DY10 01/01/2030 - 12/31/2030	
Administrative Cost						Total 5yr Waiver:
- Mercer	$0.00	$0.00	$0.00	$5,000.00	$5,000.00	$10,000.00
State Staff Cost						
- Data Collection						
- Report Writing	$10,750.00	$10,750.00	$10,750.00	$10,750.00	$11,250.00	
Total Estimated Cost:	$10,750.00	$10,750.00	$10,750.00	$15,750.00	$16,250.00	
						$64,250.00

c. The total estimated cost for all sources throughout the 5-year waiver is $64,250.00.

VI. Evaluation Timeline:

a. The State has included a timeline for conducting the various evaluation activities, including dates for evaluation-related milestones, and deliverables such as the Annual Monitoring Report, Interim and Summative Evaluation Reports:

Missouri Former Foster Care Youth 11-W-00367/7			
Deliverable	**STC reference**	**Due**	**Date**
Submit Evaluation Design Plan to CMS	STC 6.2, 6.3, 6.4, and 6.5	**180 calendar days after approval of the demonstration**	9/28/2026
Final Evaluation Design	STC 6.3	**60 days post comments received**	pending
Publish Final Evaluation Design on MHD website	STC 6.10	**30 days after CMS approval received**	pending
Draft Interim Report due	STC 6.6	**1 year prior to end of demonstration; when the application for renewal is submitted**	12/31/2029
Final Interim Report		**60 days post comments**	pending
Publish Final Interim Report on MHD website	STC 6.10	**30 days after CMS approval received**	pending
Draft Summative Evaluation Report	STC 6.7	**within 18 months of the end of approval period**	6/30/2032
Final Summative Evaluation Report	STC 6.10	**60 days post comments**	pending
Publish Final Summative Evaluation Report on MHD website	STC 6.10	**30 days after CMS approval**	pending
Annual Monitoring Report	STC 5.4	**Annual submittal to CMS no later than 180 calendar days after the end of each demonstration year.**	June 28

VII. Glossary:

AMR - **Asthma Medication Ratio**

BH - **Behavioral Health**

CCS - **Cervical Cancer Screen**

DW - **Demonstration Waiver**

ED - **Emergency Department**

FUH (MI) - **Follow-up After Hospitalization (Mental Illness)**

PCP - **Primary Care Practitioner**

W30 - **Well-Child Visits w/in First 30-Months of Life**

WCV - **Child and Adolescent Well-Care Visits**