

**Former Foster Care Youth
Missouri 1115 Waiver Extension
Application**

Project Number: 11-W-00367/7

**First Submittal:
December 10, 2024**

**Second Submittal:
April 9, 2025**

Submitted to:

**Center for Medicare and Medicaid Services
Children and Adults Health Programs
Group 75000 Security Boulevard
Baltimore, MD 21244**

Submitted by:

**Missouri Department of Social Services
MO HealthNet Division**

Table of Contents

I.	Historical Narrative Summary	3
II.	Changes Requested.....	4
III.	Programmatic Description.....	4
IV.	Summaries.....	5
V.	Financial Data.....	6
VI.	Evaluation Report.....	7
VII.	Documentation of States Compliance with Public Notice.....	10
VIII.	Demonstration Administration.....	12

Section I. Historical Narrative Summary

On August 31, 2020, the State of Missouri (Missouri) submitted an initial Section 1115 Waiver application to provide Medicaid coverage to Missouri residents who were 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 eighteen (18) and were enrolled in Medicaid while they were in foster care. The expected impact of the demonstration was that Missouri would maintain coverage for this population, increase and strengthen overall coverage of former foster care youth in Missouri, and improve their health outcomes. This application in accordance with section 1115(a) of the Social Security Act (the Act), was approved by the Centers for Medicare & Medicaid Services (CMS) as "Missouri Former Foster Care Youth" (Project Number: 11-W-00367/7) with an effective date of June 2, 2021 through December 31, 2025. The state implemented the demonstration upon approval.

On September 1, 2021, Missouri submitted an amendment to this waiver to require all children in the care and custody of Missouri and those receiving adoption subsidy assistance to enroll in a single specialty health plan on a continuous basis. Individuals under twenty-six years of age who were in foster care on their eighteenth birthday and covered by MO HealthNet, as well as persons under age twenty-six who were in foster care on their eighteenth birthday and covered by Medicaid from another state, are part of the specialty health plan eligibility group. This amendment was approved by CMS with an effective date of June 10, 2022 through December 31, 2025, upon which date, unless extended or otherwise amended, all authorities granted to operate this demonstration will expire.

The amended waiver contained demonstration goals for a population including individuals in foster care, adoption subsidy, those under age 26, and youth in the care of the Division of Youth Services to be enrolled into a single specialty health plan. Since this population receives their services under a 1915(b) waiver, they are being evaluated under existing measures for that waiver.

The single specialty health plan provides care tailored to children and youth in the care and custody of Missouri and those receiving adoption subsidy assistance. The goal is to increase and strengthen overall coverage of former foster care youth and improve health outcomes for this vulnerable population by creating a comprehensive, high-quality approach to delivering supports and services in the most integrated and child and family focused way. Missouri automatically enrolls these children into the specialty health plan and these members remain enrolled in the specialty health plan until any of the following occur:

- The member qualifies for Supplemental Security Income and the member or member's guardian chooses to disenroll from managed care.
- The member meets the qualifications described in Section 501 (a)(1)(D) of the Act and chooses to disenroll from managed care.
- The member meets the qualifications described in Section 1902 (e)(3) of the Act and chooses to disenroll from managed care.
- The member is no longer in the care and custody of Missouri nor receiving adoption subsidy assistance and is automatically disenrolled from the specialty health plan.

Missouri led a competitive procurement process and selected Home State Health as the single specialty health plan that serves these children and youth, implemented July 1, 2022.

In compliance with the SUPPORT Act and parallel to this demonstration project, Missouri implemented SPA MO-23-0007, effective January 1, 2023, for affected individuals in the state plan to cover FFCY from other states who turned 18 on or after January 1, 2023, under the State Plan. Current enrollees in this 1115 waiver will continue to be covered under this waiver. Any new enrollees from other states who turned 18 prior to January 1, 2023, but are not yet known to Missouri, will also be enrolled under this 1115 waiver.

Section II. Changes Requested

Since it is necessary to continue to serve the members of the demonstration waiver who are still eligible for services beyond December 31, 2025, the State of Missouri is requesting an extension of the current FFCY 1115(a) waiver, 11-W-00367/7. Consistent with CMS's requirements for monitoring and evaluation of section 1115 demonstrations, the state will continue conducting systematic monitoring and evaluation, as applicable. The state's demonstration efforts shall accommodate data collection and analyses stratified by key subpopulations of interest to support understanding of any existing disparities in access, utilization, and health outcomes, and how the demonstration, including this application for extension, might support bridging any such inequities.

Missouri is not requesting changes to the 1115 Former Foster Care waiver and Missouri is not requesting any changes to the Special Terms and Conditions (STCs). This extension application request will not have any negative impact to the current former foster care youth enrolled in this waiver, however, should the FFCY demonstration waiver expire, there may be a negative impact as Missouri will no longer be able to provide these services to this population, which currently administers coverage to all eligible individuals through December 31, 2025. The former foster care waiver is expected to continue to be budget neutral for the life of the approval.

Should the waiver not be extended, the State of Missouri anticipates a negative impact for members covered under this waiver, as it is possible they will not qualify for services under other state programs, thus proving detrimental to the members' future plan of care.

Section III. Programmatic Description

Children in the care and custody of Missouri and those receiving adoption subsidy assistance receive all services under either state plan or another waiver authority and would not be eligible to receive services as a former foster care youth from another state. Individuals under twenty-six years of age who were in foster care on their eighteenth birthday and covered by MO HealthNet, as well as persons under age twenty-six who were in foster care on their eighteenth birthday and covered by Medicaid from another state who are covered under this waiver, are not expected to increase utilization of services as a result of this expenditure authority. As a result, there is no expected increase or decrease in enrollment or service costs in this waiver and no impact to budget neutrality.

Population groups impacted by the FFCY 1115 demonstration waiver are:

- Out-of-State Former Foster Care Youth (FFCY), under twenty-six (26) years who were in foster care under the responsibility of a state other than Missouri or a tribe in such other state when they turned eighteen (18) (or such higher age as such other state has elected for termination of federal foster care assistance under the IV-E of the Act) for at least 6 months, were enrolled in Medicaid at the time, are now applying for Medicaid in Missouri, and are not otherwise eligible for Medicaid. The youth must have been receiving foster care for at least six (6) months in another state(s). Any new enrollees from

other states who turned 18 prior to January 1, 2023, but are not yet known to Missouri, will also be enrolled under this 1115 waiver;

- In addition, the expenditure authority to enroll a beneficiary into one specific managed care organization for the following populations:
 1. Children in state custody (foster care);
 2. Individuals that have an adoption assistance agreement;
 3. Former foster care youth under age 26 (eligible under the Medicaid state plan);
 4. Former foster care youth under age 26 (from another state and eligible under the current demonstration; and
 5. Youth in the care and custody of Division of Youth Services.

Section IV. Summaries

This demonstration continues Medicaid coverage for an eligibility group that was previously covered under the State's General Revenue Plan. Missouri has not encountered any significant program developments, issues, or problems and does not anticipate any to occur in the future.

Summaries of External Quality Review Organization (EQRO) reports, managed care organization (MCO) and State quality assurance monitoring, and any other documentation of the quality of and access to care provided under the demonstration shall be summarized by Missouri pulling enrollment data, disenrollment data, and claims data collected through administrative data.

Through the collection of the claims data, Missouri's demonstration has been successful in allowing members to maintain access to Medicaid for the former foster care youth who were in foster care and receiving Medicaid in another state who are now Missouri residents. However, the limited amount of encounter data and claims submitted on behalf of the small number of individuals covered under this demonstration makes it difficult to measure and show whether it improves health outcomes for the population.

In DY1, which was the initial start of the waiver and did not have a full year of data collected, there were a total of four members enrolled, a total of seven claims, one emergency department visit, and two primary care appointments.

In DY2, there were a total of four members enrolled, two of the four enrollees utilized more than one service with a primary care provider or clinic, which indicates they have access to primary care. They also utilized services not chosen for monitoring, which indicates they have access to multiple type of services.

In DY3, there were a total of four enrollees and one disenrollment due to aging out. Two of the four enrollees utilized more than one service with a primary care provider or clinic, which indicates they have access to primary care. It appears all members utilized multiple services not chosen for monitoring, which indicates they have access to numerous types of services.

Claims data for DY4 has not yet been received for review at the time of this application.

Reviewing the most recent DY3 data which had the most claims available of all years monitored, the services most used by the members were medical services and outpatient services. Out of a total of 319 claims, 263 were for medical services and 41 were for outpatient services.

As of this date, there have been no grievances or appeals filed.

To remain consistent with CMS requirements for this section 1115 demonstration, and as outlined in the special terms and conditions (STCs), specifically STC 23, when the waiver is extended, the state will continue to submit three (3) Quarterly and one (1) Annual Monitoring Report each DY per 42 CFR 431.428, throughout the life cycle of the FFCY demonstration extended approval period.

When this FFCY demonstration waiver is due to expire again, Missouri will request another extension in order to maintain coverage for any remaining, eligible, former foster care youth and the population of individuals enrolled in the single specialty health plan, in order to continue our efforts to increase and strengthen overall coverage for youth in Missouri, with the expectation to improve health outcomes for these populations. Since the specialty plan population receives their services under a 1915(b) waiver, they are being evaluated under existing measures for that waiver and at that time, no further monitoring will be completed under the current STCs of this waiver.

Section V. Financial Data

The state proposes to finance the non-federal share of expenditures under the demonstration using state general funds.

Per the November 21, 2016 *CMCS Informational Bulletin*, CMS will allow costs of this demonstration to be treated as “pass-through” for budget neutrality. The CY25 projections include a per member per month (PMPM) rate for foster care services of \$745.55, which is the CMS approved PMPM for DY5 as reported in the Special Terms and Conditions. To assume inflation of cost over the demonstration years (DY), the U.S. Bureau of Labor Statistics Consumer Price Index for medical inflation of 6.496% was used for future DY, which is reflected in the CY increases.

The projected eligible participant per month total is four, decreasing by one in both CY26 and in CY29.

The member months were calculated by multiplying participant per month total by 12.

Actuals:

CY21: \$10,127
CY22: \$10,338
CY23: \$29,287

Projected:

CY24: \$33,953
CY25: \$35,786
CY26: \$28,583
CY27: \$30,440
CY28: \$32,417
CY29: \$23,016
CY30: \$24,511

Section VI. Evaluation Report

An [evaluation report](#) of the demonstration is attached, inclusive of evaluation activities and findings to date, and plans for evaluation activities during the extension period.

Through the collection and review of claims data, Missouri's demonstration has been successful in allowing members to maintain access to Medicaid for the former foster care youth who were in foster care and receiving Medicaid in another state who are now Missouri residents. However, the limited amount of encounter data and claims submitted on behalf of the small number of individuals covered under this demonstration makes it difficult to measure and show whether it improves health outcomes for the population.

Per Missouri's approved Evaluation Design, Missouri will continue to use the same goals and hypotheses as well as continue to analyze these outcome measures.

The [Evaluation Design](#) demonstration goals that will be continued to be tested are:

1. Maintain access to Medicaid coverage for former foster care youth that meet the eligibility criteria.
2. 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.

Design Table:

Evaluation Questions	Evaluation Hypotheses	Measures	Data Sources	Analytic Methods
Demonstration Goal: Maintain access to Medicaid coverage for former foster care youth that 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?	Member will have access to needed health services.	- PCP Visits for demonstration waiver (DW) members/total members	Administrative - Encounter Claims	Descriptive statistics (frequencies and percentages)

		<ul style="list-style-type: none"> - ED Visits for DW members/total members - 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?	Member's health outcomes will improve.	<ul style="list-style-type: none"> - 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 	Administrative – Encounter/HEDIS data FUH (MI) Follow-up within 7 days of discharge from Inpatient Hospital AMR W30 WCV ADV CCS	Descriptive Statistics

		<p>medication for asthma</p> <p>- Total number of DW members with an annual preventive visit / Total number of members</p> <p>- Total number of DW members with a cervical cancer screening / Total number of members eligible for cervical cancer screen</p>		
--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--

*Acronyms included in "Design Table" are listed in the glossary of the approved Evaluation Design, attached.

Through the collection of claims data, Missouri submits Quarterly and Annual Reports each DY per 42 CFR 431.428. Data collected throughout Missouri's demonstration indicates Missouri has been successful in allowing members to maintain access to Medicaid for the former foster care youth who were in foster care and receiving Medicaid in another state who are now Missouri residents. However, the limited amount of encounter data and claims submitted on behalf of the small number of individuals covered under this demonstration makes it difficult to measure and prove it improves health outcomes for the population.

In DY1, which was the initial start of the waiver and did not have a full year of data collected. There was a total of four members enrolled, a total of seven claims, one emergency department visit, and two primary care appointments.

In DY2, there was a total of four members enrolled, two of the four enrollees utilized more than one service with a primary care provider or clinic, which indicates they have access to primary care. They also utilized services not chosen for monitoring, which indicates they have access to multiple type of services.

In DY3, there was a total of four enrollees and one disenrollment due to aging out. Two of the four enrollees utilized more than one service with a primary care provider or clinic, which indicates they have access to primary care. All members also utilized multiple services not chosen for monitoring, which indicates they have access to numerous types of services.

As of this date, there have been no grievances or appeals filed.

There is a possibility of additional members to become enrolled through this waiver through the year 2030. Any new enrollees from other states who turned 18 prior to January 1, 2023, but are not yet known to Missouri, will also be enrolled under this 1115 waiver as an Out-of-State Former Foster Care Youth (FFCY), under twenty-six (26) years who were in foster care under the responsibility of a state other than Missouri or a tribe in such other state when they turned eighteen (18) (or such higher age as such other state

has elected for termination of federal foster care assistance under the IV-E of the Act) for at least 6 months, were enrolled in Medicaid at the time, are now applying for Medicaid in Missouri, and are not otherwise eligible for Medicaid. These members may still apply for services in Missouri and would be eligible through this waiver until December 31, 2030, whereas all possible eligible FFCY members from other states would then age out.

Once the current out of state FFCY members age out, Missouri will need to continue the 1115 demonstration waiver beyond December 31, 2030, to allow for the expenditure authority to enroll a beneficiary into one specific managed care organization for the following populations:

1. Children in state custody (foster care);
2. Individuals that have an adoption assistance agreement;
3. Former foster care youth under age 26 (eligible under the Medicaid state plan);
4. Youth in the care and custody of Division of Youth Services.

However, the amended waiver contained demonstration goals for a population including individuals in Missouri foster care, adoption subsidy, those under age 26, and youth in the care of the Division of Youth Services to be enrolled into a single specialty health plan. Since this population receives their services under a 1915(b) waiver, they are being evaluated under existing measures for that waiver.

Section VII. Documentation of States Compliance with Public Notice

1. Start and end dates of the state's public comment period.
2. Certification that the state provided public notice of the amendment which may include: a link to the state's web site, a notice in the state's Administrative Record, a notice in the state's newspaper of widest circulation, or use of an electronic mailing list or similar mechanism to notify the public at least 30 days prior to submitting the amendment to CMS.
3. Comments received by the state during the 30-day public notice period.
4. Certification that the state conducted tribal consultation in accordance with the state's approved Medicaid state plan, or at least 60 days prior to submitting this Demonstration application if the Demonstration has or would have a direct effect of Indians, tribes, on Indian health programs, or on urban Indian health organizations, including dates and method of consultation.

Written Documentation of Public Comment Period for 1115 Waiver:

The State of Missouri conducted a public comment period for application of 1115 Waiver on Former Foster Care Youth pursuant to Centers for Medicare and Medicaid Services (CMS) requirements in 42 C.F.R. § 431.408. The comment period was for the duration of October 1, 2024 – November 7, 2024, a total of 38 days.

During this period, Missouri held two separate public hearings to provide the public the opportunity to make comments or ask questions on the demonstration application extension. The State conducted one public hearing on October 30, 2024 and a second public hearing on October 31, 2024. Both of these hearings were held virtually.

The public also had opportunities to send comments by regular mail, express, or overnight mail, or by courier and including the ability to submit comments via email through November 7, 2024. There were no questions and/or comments received. The State of Missouri was prepared to take into consideration all questions and/or comments in developing the demonstration application by reviewing the application to ensure that it meets all applicable legislation. Senate Bill 514 passed and is now incorporated into RSMo 208.151.

Below is the Public Notice(s) that was published at least 30 days in advance as required by 42 C.F.R. § 431.408.

**Public Notice of Application for
Former Foster Care Youth
Section 1115 Demonstration
September 27, 2024**

The State of Missouri, Department of Social Services (DSS) and MO HealthNet Division (MHD) hereby notify the public of submission of a proposed application extension to the current Section 1115 Demonstration, Former Foster Care Youth. A copy of the Section 1115 Demonstration documents and application extension request may be found at [Former Foster Youth 1115 Waiver | mydss.mo.gov](https://mydss.mo.gov/Former-Foster-Youth-1115-Waiver). This notice is being provided pursuant to Centers for Medicare and Medicaid Services (CMS) requirements in 42 C.F.R. § 431.408.

The purpose of this application is to extend our current demonstration and allow MHD to continue to provide coverage to current Missouri residents who are former foster care youth under age 26, who were in foster care under the responsibility of another state for at least six months as of the date they turned age 18 and were enrolled in Medicaid while they were in foster care. Missouri intends to continue to maintain coverage for this population of former foster care youth, increase and strengthen overall coverage of former foster care youth in Missouri, and improve health outcomes for these youth.

Public Comments and Hearings

The public is invited to review and comment on the State’s proposed demonstration extension request.

Comments may be sent by regular mail, express mail, overnight mail, or by courier within thirty (30) days after the publication of this notice, and comments must be sent to the following address:

**MO HealthNet Division
615 Howerton Court, 2nd Floor
Jefferson City, MO 65019
Attn: Barbee Pippert**

Comments may also be emailed to Ask.MHD@dss.mo.gov. Please use “Public Comment for Former Foster Care Youth Application Extension” in the subject line. Written comments must be received no later than November 7, 2024.

The following public hearings are scheduled to be held virtually.

The public is invited to comment on the proposed demonstration at a virtual public hearing. Attendees

may join the meeting via Webex:

Public Meeting #1
Wednesday, October 30, 2024
11:00am – 12:00pm
Dial-In Number: 1-650-479-3207
Meeting ID #: 2631 487 2455
Meeting password: iPRpcs3Rg43

Public Meeting #2
Thursday, October 31, 2024
1:00pm – 2:00pm
Dial-In Number: 1-650-479-3207
Meeting ID #: 2632 806 7376
Meeting password: mJs2vMppN32

Summary of Comments – There were no questions and/or comments received at either virtual public forum held, nor any mailings or e-mails received.

The State of Missouri conducted a public comment period for application of 1115 Waiver on Former Foster Care Youth pursuant to Centers for Medicare and Medicaid Services (CMS) requirements in 42 C.F.R. § 431.408. The comment period was for the duration of December 31, 2024 – February 5, 2025, a total of 36 days.

On December 31, 2024, MO HealthNet posted a public notice inviting the public to comment on the proposed demonstration at an in-person public hearing and provide written correspondence via mail or e-mail through February 5, 2025. The public was able to attend the meeting scheduled for February 5, 2025, in-person at the following location:

MO HealthNet Division
615 Howerton Court, 2nd Floor
Conference Room 210
Jefferson City, MO 65019

All public forum notices are posted on the MHD website for FFCY 1115 Demonstration Waiver located at <https://mydss.mo.gov/mhd/waiver/former-foster-youth-1115>.

Posted with the notice(s) for public comment were the following documents:

- [Public Notice of Application #1](#)
- [Public Notice of Application #2](#)
- [Public Notice of Application #3](#)
- [MO 1115 FFCY application for extension 2024 public comment](#)
- [Interim Evaluation Report](#)
- [Evaluation Design 04-2024](#)

Summary of Comments – There were no attendees, questions, and/or comments received at the in-person public forum held, nor any mailings or e-mails received.

The State of Missouri also notified our tribal consultation via notification at gcrouser@kcindiancenter.org on September 27, 2024, providing notice of our intent to extend the FFCY 1115 Demonstration Waiver and offered until November 7, 2024 to respond with any questions and/or comments. There were no questions and/or comments received from the tribal consult.

Section VIII. Demonstration Administration

Contact information for Missouri's point of contact for the demonstration is as follows:

Name: Barbee Pippert
Title: Senior Program Specialist
E-Mail Address: Barbee.Pippert@dss.mo.gov