

March 28, 2023

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

RE: AHCCCS Former Foster Youth Annual Automatic Renewal 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 Annual Automatic Renewal 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 Annual Automatic Renewal 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 process 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 the 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.

This amendment proposal is submitted 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 initiatives proposed in this waiver request were informed by a robust public input process. AHCCCS engaged 220 stakeholders during the tribal consultation and public notice process, obtaining input from the State Medicaid Advisory Committee, community members participating in two virtual public forums, and tribal representatives during a Tribal Consultation session. In addition, stakeholders supplied seven written responses, offering overwhelming support for the Former Foster Youth Automatic Renewal Amendment and the strategies detailed in the waiver proposal.

Thank you again for your consideration of the Former Foster Youth Annual Automatic Renewal 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 handwritten signature in black ink, appearing to read 'Carmen Heredia', written in a cursive style.

Carmen Heredia
Director

CC: Daniel Tsai, Deputy Administrator and Director, Centers for Medicaid & CHIP Services
Anne Marie Costello, Deputy Director, Center for Medicaid & CHIP Services
Judith Cash, Director of State Demonstrations Group, Center for Medicaid & CHIP Services
Kelsey Smyth, Division of Eligibility and Coverage Demonstrations, State Demonstrations Group,
Center for Medicaid & CHIP Services
Kate Friedman, Division of Eligibility and Coverage Demonstrations, State Demonstrations
Group, Center for Medicaid & CHIP Services
Brian Zolynas, State Lead, Center for Medicaid & CHIP Services
Zaida Dedolph, Senior Policy Advisor, Arizona Governor's Office



**Arizona Section 1115 Waiver
Amendment Request:
Former Foster Youth Annual Automatic Renewal**

March 30, 2023



Former Foster Youth- Annual Automatic Renewal

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Former Foster Youth- Annual Automatic Renewal

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 waive the condition of eligibility in 42 CFR 435.608 requiring Medicaid beneficiaries to apply for other cash benefits for the Former Foster Youth population. 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 Automatic Renewal 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.

This 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 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. 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:

¹ Sources:

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

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- 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 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 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:

- 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, including⁶:

- 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.

Finally, there is national recognition that unwinding at the end of the COVID- 19 Public Health Emergency (PHE) presents possible scenarios where state Medicaid enrollment could decline between five and 13 percent with the expiration of the continuous eligibility requirement in Section 6008 of the Families First Coronavirus Response Act.⁷ Current literature indicates that maximizing streamlined renewal processes

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

Häggman-Laitila, A., Saloekkilä, 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/articles/PMC4617302>

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

⁷<https://www.kff.org/medicaid/issue-brief/10-things-to-know-about-the-unwinding-of-the-medicaid-continuous-enrollment-requirement/>

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can promote continuity of coverage when the PHE ends and can increase the percentage of the YATI population that will remain eligible once standard eligibility actions resume.

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

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.

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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 Annual Automatic Renewal 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.	

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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 January 13, 2023 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 January 13, 2023, 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 A**.

Stakeholder Meetings

AHCCCS presented the details of Arizona's demonstration amendment proposal during a virtual Tribal Consultation meeting on February 9, 2023, and conducted two virtual public forum meetings on January 23, 2023, and February 22, 2023. In addition, the demonstration amendment proposal was presented at the State Medicaid Advisory Committee (SMAC) meeting on January 11, 2023. 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 Division of Community Advocacy and Intergovernmental Relations (DCAIR); 801 E. Jefferson Street, MD 4200, Phoenix, AZ 85034. All comments must have been received by February 27, 2023. 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 B**.

VII. PUBLIC COMMENT SUMMARY

As part of Arizona's Former Foster Youth Annual Automatic Renewal 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

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comments are included in **Appendix C**. While all comments were supportive of the proposed services, a summary of the key themes and additional recommendations is included below. AHCCCS has considered and, in some cases, used the comments to help inform changes to the Former Foster Youth Annual Automatic Renewal waiver proposal.

Statements of Support

All comments received were supportive of automatic annual renewals 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 - Annual Automatic Renewal waiver proposal.

Consideration of Additional Services

Stakeholders requested consideration of additional services beyond those identified in the Former Foster Youth Annual Automatic 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

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linkages to other state and federal benefit programs is supported and could impact the Former Foster Youth population.

VIII. BUDGET NEUTRALITY

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



APPENDIX A

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) ADMINISTRATION

[M22-79]

1115 RESEARCH AND DEMONSTRATION WAIVER AMENDMENT REQUEST: FORMER FOSTER YOUTH ANNUAL AUTOMATIC RENEWAL

1. **Name of the Agency: Arizona Health Care Cost Containment System Administration (AHCCCS)**
2. **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 waive the condition of eligibility in 42 CFR 435.608 requiring Medicaid beneficiaries to apply for other cash benefits for the Former Foster Youth population. 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 Automatic Renewal 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.

This request is in alignment with House Bill 2622 passed by Arizona's 55th Legislature. Subject to approval from CMS, the AHCCCS administration will be 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 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 health-care 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 (i):

- 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 (ii):

- 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. (iii)

Consistent, 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 (iv), and former foster youth show an even higher reliance on public insurance coverage options than the general Medicaid population (v):

- 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 (vi):

- 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.

Finally, there is national recognition that unwinding at the end of the COVID- 19 Public Health Emergency (PHE) presents possible scenarios where state Medicaid enrollment could decline between five and 13 percent with the expiration of the continuous eligibility requirement in Section 6008 of the Families First Coronavirus Response Act (vii). Current literature indicates that maximizing streamlined renewal processes can promote continuity of coverage when the PHE ends and can increase the percentage of the YATI population that will remain eligible once standard eligibility actions resume.

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 26 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.

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 Annual Automatic Renewal 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 January 13,2023 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 January 13, 2023, 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 virtual 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. Details regarding the public forum meetings can be found below:

Public Forum Meeting	Meeting Dates & Times	Meeting Web Link & Call-in Information
Public Forum #1	January 23, 2023, 11 a.m.-12 p.m. AZ Time	<p>Register in advance for this webinar: https://ahcccs.zoom.us/webinar/register/WN_-7O_0M50T0O2Qw9N3IZEYg</p> <p>Or join by phone: US: +1 669 900 6833 or +1 408 638 0968 or +1 669 444 9171 or +1 346 248 7799 or +1 719 359 4580 or +1 253 205 0468 or +1 253 215 8782 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 or +1 507 473 4847 Webinar ID: 876 1261 2718 Passcode: 67873274</p>
Public Forum #2	February 22, 2023, 3:00 p.m.-4:00 p.m. AZ Time	<p>Register in advance for this webinar: https://ahcccs.zoom.us/webinar/register/WN_zT-VTjj4Ry6XgdiBpNidrA</p> <p>Or join by phone: US: +1 669 444 9171 or +1 669 900 6833 or +1 408 638 0968 or +1 253 205 0468 or +1 253 215 8782 or +1 346 248 7799 or +1 719 359 4580 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 or +1 507 473 4847 or +1 564 217 2000 or +1 646 876 9923 Webinar ID: 821 3658 0044 Passcode: 57867042</p>

Tribal Consultation	February 9, 2023, 1:00 p.m.- 5:00 p.m. AZ Time	<p>Register in advance for this Webinar: https://ahcccs.zoom.us/webinar/register/WN_9zmQJUu9QWCNDAkehF3N5A</p> <p>Or join by phone: US: +1 669 900 6833 or +1 408 638 0968 or +1 669 444 9171 or +1 253 215 8782 or +1 346 248 7799 or +1 719 359 4580 or +1 253 205 0468 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 or +1 507 473 4847 or +1 564 217 2000 or +1 646 876 9923 Webinar ID: 831 1228 7623 Passcode: 90240070</p>
State Medicaid Advisory Committee (SMAC)	January 11, 2023, 1:00 p.m.-3:00 p.m. AZ Time	<p>Please click this URL to join: https://ahcccs.zoom.us/j/83165050454?pwd=a3VsUE9XY1ZRY096SCtqWnVmZmk1pUT09</p> <p>Passcode: SMAC2023! Join by Audio Only: 877 853 5257 (Toll Free) or 888 475 4499 (Toll Free) or 833 548 0276 (Toll Free) or 833 548 0282 (Toll Free) Webinar ID: 831 6505 0454 Passcode: 840617815</p>

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 February 27, 2023. 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>

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.

VIII. Sources

- i. <https://www.medicaid.gov/state-resource-center/mac-learning-collaboratives/downloads/foster-care-ensuring-coverage-continuity.pdf>
- ii. <https://www.aecf.org/blog/child-welfare-and-foster-care-statistics>
 Häggman-Laitila, A., Salokkila, 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>
- iii. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5644395/>
- iv. Winkleman, T and V. Chang. 2018. “Medicaid Expansion, Mental Health, and Access to Care.”
- v. <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/articles/PMC4617302>
- vi. <https://www.medicaid.gov/state-resource-center/mac-learning-collaboratives/downloads/foster-care-ensuring-coverage-continuity.pdf>
- vii. <https://www.kff.org/medicaid/issue-brief/10-things-to-know-about-the-unwinding-of-the-medicaid-continuous-enrollment-requirement/>

Former Foster Youth Annual Automatic Renewal

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 waive the condition of eligibility in 42 CFR 435.608 requiring Medicaid beneficiaries to apply for other cash benefits for the Former Foster Youth population. AHCCCS currently offers transitional medical care for children leaving foster care that are between the ages 18 to 26.



AHCCCS will present the details about Arizona’s Demonstration amendment proposal during a virtual 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. Details regarding the public forum meetings can be found below:

Forum Registration and Webinar Details

PUBLIC FORUMS	
Dates	Zoom Links
Public Forum #1 January 23, 2023 11 a.m.-12 p.m. AZ Time	Register in advance for this webinar: Or join by phone: US: 1-669-900-6833, 1-408-638-0968, 1-669-444-9171, 1-346-248-7799, 1-719-359-4580, 1-253-205-0468, 1-253-215-8782, 1-564-217-2000, 1-646-876-9923, 1-646-931-3860, 1-689-278-1000 Webinar ID: 876 1261 2718 Passcode: 67873274
Public Forum #2 February 22, 2023 3:00 p.m.-4:00 p.m. AZ Time	Register in advance for this webinar: Or join by phone: US: 1-669-444-9171, 1-669-900-6833, 1-408-638-0968, 1-253-205-0468, 1-253-215-8782, 1-346-248-7799, 1-719-359-4580, 1-646-931-3860, 1-689-278-1000, 1-301-715-8592, 1-305-224-1968, Webinar ID: 821 3658 0044 Passcode: 57867042
Tribal Consultation February 9, 2023 1:00 p.m.- 5:00 p.m. AZ Time	Register in advance for this webinar: Or join by phone: US: 1-669-900-6833, 1-408-638-0968, 1-669-444-9171, 1-253-215-8782, 1-346-248-7799, 1-719-359-4580, 1-253-205-0468, 1-646-931-3860, 1-689-278-1000, 1-301-715-8592, 1-305-224-1968, 1-309-205-3325, 1-312-626-6799 Webinar ID: 831 1228 7623 Passcode: 90240070



NEWS

January 6, 2023

You're Invited to AHCCCS Community Events in January

The AHCCCS Division of Community Advocacy and Intergovernmental Relations holds community meetings each month 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.

OIFA Health Care Navigation

TOPICS: How to Find a Provider

WHEN: Tuesday, January 24, noon—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: OIFA will demonstrate their empowerment tools and answer questions on how to find a provider and where to start as well as provide information on finding a primary care provider, a specialty provider, a behavioral health provider, and go over questions to ask when considering a new provider.

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

Waiver Amendment Forum on Former Foster Youth Annual Automatic Renewal

TOPIC: Discussion on Former Foster Youth Annual Automatic Renewal Waiver Amendment

WHEN: Monday, January 23, 11:00 a.m.—noon

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

To join by audio only:

+1 669 900 6833

Webinar ID: 876 1261 2718

Passcode: 67873274

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: In this proposal, we are requesting CMS 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 until the individual reaches 26 years of age.

Office of Human Rights: Why Assess for Special Assistance for Individuals Living with a Serious Mental Illness?

TOPICS: Why Assess for Special Assistance for Individuals Living with a Serious Mental Illness?

WHEN: Thursday, January 26, 3:00—4:30 p.m.

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

WHO SHOULD ATTEND: AHCCCS members who use behavioral health services or have 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: OHR will provide education and resources on the mandatory, important requirement of assessing for Special Assistance for members living with a Serious Mental Illness. OHR will define Special Assistance and its criteria, and review the Arizona Administrative Code and AHCCCS policies related to Special Assistance. The presentation will also include an overview of the departments within the Division of Advocacy and Intergovernmental Relations, OHR, OIFA and the Federal Relations teams.

Housing and Health Opportunities (H2O) Waiver Forum

TOPICS: Housing and Health Opportunities (H2O) Waiver

WHEN: Tuesday, January 31, 11:00 a.m.—noon

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 AHCCCS to learn more about the Housing and Health Opportunities (H2O) program and provide your input as the agency works toward a final implementation plan.

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

Thank you,



NEWS

February 2, 2023

You're Invited to AHCCCS Community Events in February

The AHCCCS Division of Community Advocacy and Intergovernmental Relations holds community meetings each month 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.

Hot Topics

TOPICS: Changes to the Evaluation for Court Ordered Assessment Form, 988, and the Arizona Crisis Hotlines

WHEN: Monday, February 13, 11:00 a.m.—11:30 a.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: Join us in February to learn about changes to the Evaluation for Court Ordered Assessment Form, where to access the new form, updates on accessing crisis services, and how 988 has been integrated into the Arizona crisis continuum.

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

Twelve Guiding Principles Community Forum- OIFA Alliance Initiative

TOPICS: Twelve Guiding Principles

WHEN: Tuesday, February 21, 3:00 p.m. —4:00 p.m. [Register in advance.](#)

Wednesday, February 22, 6:00 p.m. —7:00 p.m. [Register in advance.](#)

Thursday, February 23, 9:00 a.m. —10:00 a.m. [Register in advance.](#)

WHERE: online on Zoom.

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 share your ideas on updating the language to the 12 Guiding Principles to align with our Integrated System of Care. At each of the forums, we will review the proposed draft language.

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

Waiver Amendment Forum on Former Foster Youth Annual Automatic Renewal

TOPIC: Discussion on Former Foster Youth Annual Automatic Renewal Waiver Amendment

WHEN: Wednesday, February 22, 3:00 p.m.—4:00 p.m.

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

To join by audio only:

+1 669 900 6833

Webinar ID: 821 3658 0044

Passcode: 57867042

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: In this proposal, we are requesting CMS 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 until the individual reaches 26 years of age.

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

Jacob's Law Training

TOPICS: Arizona House Bill 2442 (also referred to as Jacob's Law)

WHEN: Thursday, February 23, 6:00 p.m.—8:00 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: This training will cover the following; overview of Jacob's law, review and use of the DCS placement packet, legal rights and protections of children and resource parents, and covered services.

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

OIFA Health Care Navigation

TOPICS: Therapeutic Foster Care

WHEN: Tuesday, February 28, noon—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: OIFA will demonstrate their empowerment tool and answer questions on Therapeutic Foster Care (TFC) for Children. TFC is a covered behavioral health service for children and foster children who could benefit from a supportive and structured home.

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

Office of Human Rights

TOPICS: Rights of Individuals Living with a Serious Mental Illness

WHEN: Tuesday, February 28, 9:00 a.m. -10:30 a.m.

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

WHO SHOULD ATTEND: AHCCCS members who use behavioral health services or have 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: The rights of individuals living with a Serious Mental Illness (SMI) and how to navigate those rights in the Arizona behavioral health delivery system.


Thank you,

Your DCAIR team

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Last day! AHCCCS is requesting to renew medical care automatically. Public comment on our 1115 Waiver will be open through today (Feb. 27) via email to waiverpublicinput@azahcccs.gov and mail. Learn more: <http://ow.ly/BVp050MzrFP>



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Learn more about the 1115 Waiver:
<http://ow.ly/a44U50MzrA6>



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Learn more: <http://ow.ly/Z0r350Mzq3u>

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Published by Hootsuite • 23 January

Today at 11 a.m. (1/23)! Give us your feedback about our proposed 1115 Waiver for former foster youth. Register now: <http://ow.ly/L8iv50Mkeea>

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**Waiver Amendment Forum:
Former Foster Youth Annual Automatic Renewal
Jan. 23 - 11:00 a.m.**

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MONDAY (1/23)! Give us your feedback at our community forum about our proposed 1115 Waiver for former foster youth. Register now: <http://ow.ly/E1z650MkefB>

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**Waiver Amendment Forum:
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Jan. 23 - 11:00 a.m.

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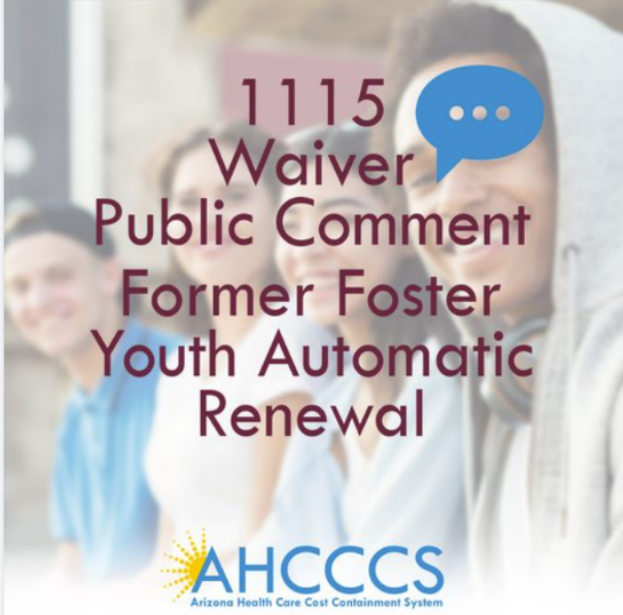
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We need your input! Join AHCCCS on Jan. 23 at 11 a.m. to discuss our proposed 1115 Waiver for former foster youth. Register in advance: <http://ow.ly/yBo050Mke5h>



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Learn more about the 1115 Waiver in our bio!
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ahccgov • Until February 27, AHCCCS is accepting public comment on our 1115 Waiver to secure automatic renewal of Former Foster Youth.

Check out our bio to learn more!

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Former Foster Youth Annual Automatic Renewal**

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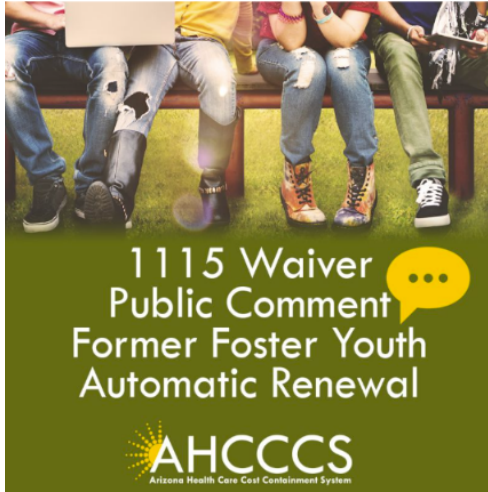
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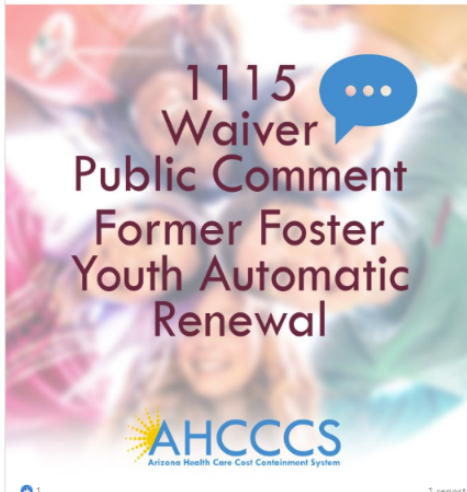
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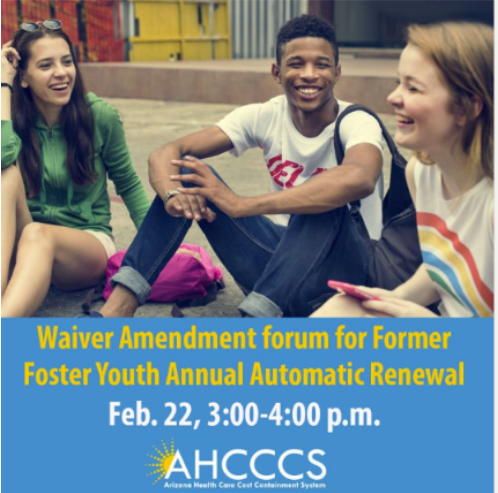
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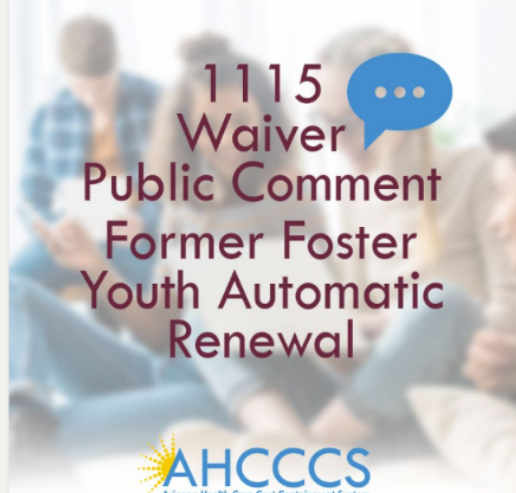
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We need your input! Join AHCCCS on Jan. 23 at 11 a.m. to discuss our proposed 1115 Waiver for former foster youth. Register in advance: <http://ow.ly/u9B850Mke5f>

AHCCCS
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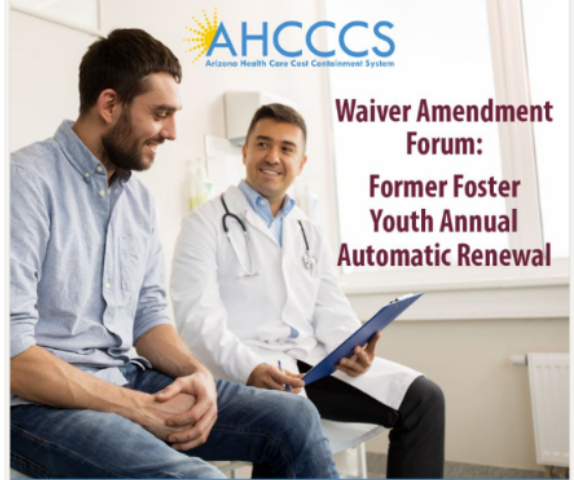
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Arizona Health Care Cost Containment System (AHCCCS)
6,800 followers
1mo •

MONDAY (1/23)! Give us your feedback at our community forum about our proposed 1115 Waiver for former foster youth. Register now: <http://ow.ly/gef950MkefE>



**Waiver Amendment
Forum:
Former Foster
Youth Annual
Automatic Renewal**

Jan. 23 - 11:00 a.m.

1

1 repost



Like

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Organic impressions: 151 Impressions


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Get up to 18,000 more impressions by boosting this post. ?

Boost

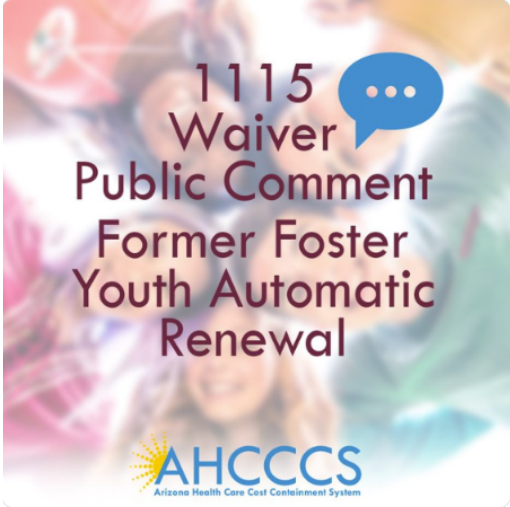
Twitter

← Tweet


 **AHCCCS** @AHCCCSgov

AHCCCS needs your input! Email your public comments through Feb. 27 about automatic renewal of former foster youth medical care

Learn more about the 1115 Waiver: [ow.ly/zRQ150MzrA4](https://www.azahcccs.gov/1115)



1115 Waiver
Public Comment
Former Foster Youth Automatic Renewal



Arizona Health Care Cost Containment System

10:02 AM · Feb 23, 2023 · 84 Views

View Tweet analytics

1 Like

Reply Retweet Like Share

 Tweet your reply Reply

 **AHCCCS** @AHCCCSgov

Last day! AHCCCS is requesting to renew medical care automatically. Public comment on our 1115 Waiver will be open through today (Feb. 27) via email to waiverpublicinput@azahcccs.gov and mail. Learn more: [ow.ly/Qau850MzrFO](https://www.azahcccs.gov/1115)



1115 Waiver
Public Comment
Former Foster Youth Automatic Renewal


Arizona Health Care Cost Containment System

9:04 AM · Feb 27, 2023 · 71 Views

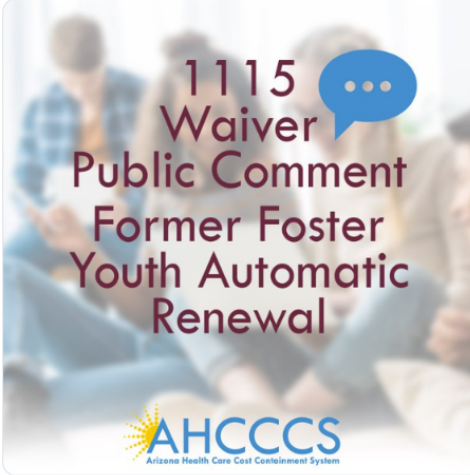
View Tweet analytics

Reply Retweet Like Share

 Tweet your reply Reply



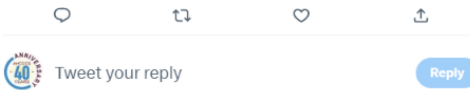
We need your input! Submit a public comment on our 1115 Waiver to automatically renew former foster youth's health care coverage. You can submit your comments via email to waiverpublicinput@azahcccs.gov by February 27.



10:02 AM · Feb 16, 2023 · 775 Views

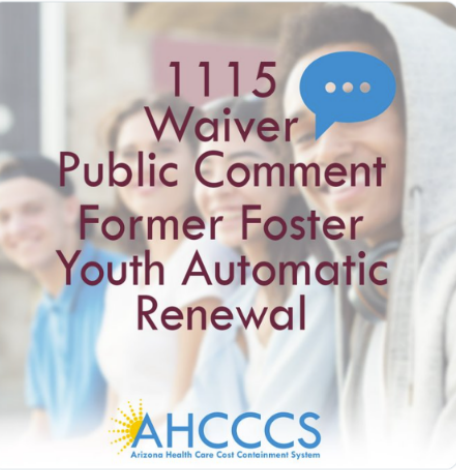
View Tweet analytics

3 Retweets 4 Likes



AHCCCS is requesting to renew medical care automatically for former foster youth aged 18-26 through our 1115 Waiver.

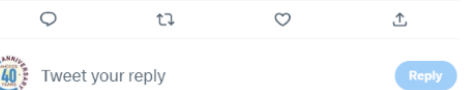
Leave a public comment:
ow.ly/FvAO50Mzqm6



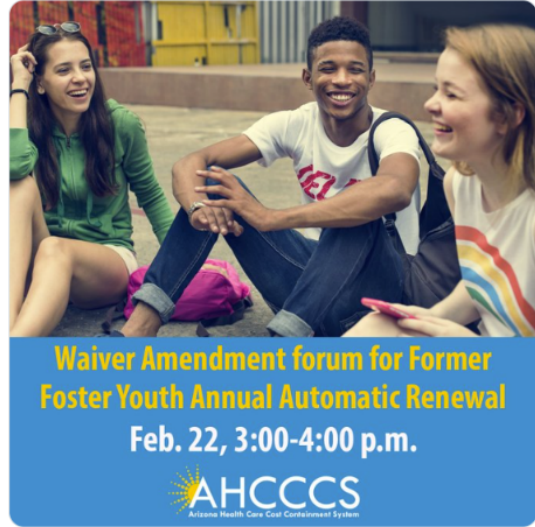
10:02 AM · Feb 7, 2023 · 347 Views

View Tweet analytics

5 Likes



TOMORROW (2/22)! Give us your input on our 1115 Waiver amendment for former foster youth automatic renewals. Register now with the link in our bio.



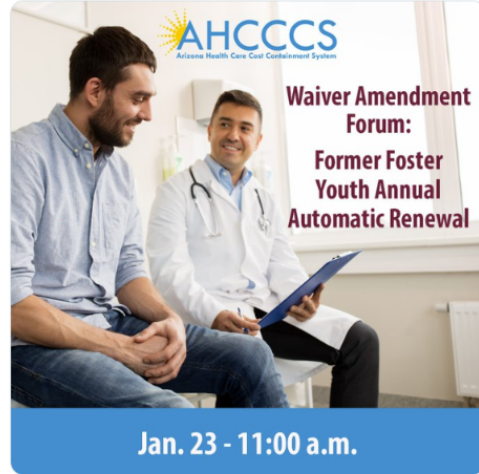
12:01 PM · Feb 21, 2023 · 112 Views

View Tweet analytics



Tweet your reply

MONDAY (1/23)! Give us your feedback at our community forum about our proposed 1115 Waiver for former foster youth. Register now: ow.ly/Zxbq50MkefF



2:01 PM · Jan 20, 2023 · 104 Views

View Tweet analytics



Tweet your reply



Today at 11 a.m. (1/23)! Give us your feedback about our proposed 1115 Waiver for former foster youth. Register now: ow.ly/gnbs50Mkeo7



8:30 AM · Jan 23, 2023 · 942 Views

View Tweet analytics

1 Quote Tweet 3 Likes



Tweet your reply

Reply



We need your input! Join AHCCCS on Jan. 23 at 11 a.m. to discuss our proposed 1115 Waiver for former foster youth. Register in advance: ow.ly/OEkj50Mke5g



12:01 PM · Jan 13, 2023 · 98 Views

View Tweet analytics



Tweet your reply

Reply



APPENDIX B

Waiver Amendment Public Forum Meeting Agenda, Slides and Comments





Welcome to Waiver Amendment Forum on Foster Youth Annual Renewal Waiver

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.



Statewide Arizona Crisis Hotline

**Call: 1-844-534-HOPE (4673) or
Text: 4HOPE (44673)**



Members: Make Sure Your Contact Info Is Current In Health-e-Arizona PLUS

Need to report a change?

The screenshot shows the Health-e-Arizona PLUS website interface. The 'I Want To...' menu on the left has 'Report a Change' highlighted with a red box. The 'My Account' section shows a verified ID and address: 701 E Jefferson St, Phoenix, AZ, 85034-2215. The 'My Medical Assistance' table shows one entry:

Name	Program	Begin Date	End Date
	AHCCCS Medical Assistance	09/01/2021	

The 'My Applications' section has a red message: 'Please click on an application number to view the Application Details'. The 'My Household' table shows one application:

Application Number	Date Started	Date Sent	Status	View
2021272000237	9/30/2021	MA 9/30/2021	Submitted	Provide/View Documents View Application Summary

www.healtharizonaplus.gov

UPDATE YOUR INFORMATION TODAY!

Make sure your contact information is up to date so AHCCCS can contact you, if needed.

INDIVIDUAL AND FAMILY
Connecting individuals and families to coverage.

AHCCCS
Arizona Health Care Cost Containment System

Log in or create an account today at www.healtharizonaplus.gov

Health-e-Arizona PLUS Address Changes

Address changes can be reported online using Health-e-Arizona PLUS.

Report a Change

- New Contact Information
- Update Address Confidentiality Program (ACP) Enrollment
- Add Person(s) - Someone Moved in or Had a Baby
- Remove Person(s) - Someone Moved Out or is Deceased
- Household Moved or Will Move
 - Moved Within Arizona
 - Moved Out of Arizona
- Update Information About a Person(s)
- Update Tax Filing Information
- Income Changed
- Expenses Changed
- Apply for another program
- Disability Changed
- Update Alternative Format

You can tell us the change here, but there will be a delay to process the potential change in benefits.

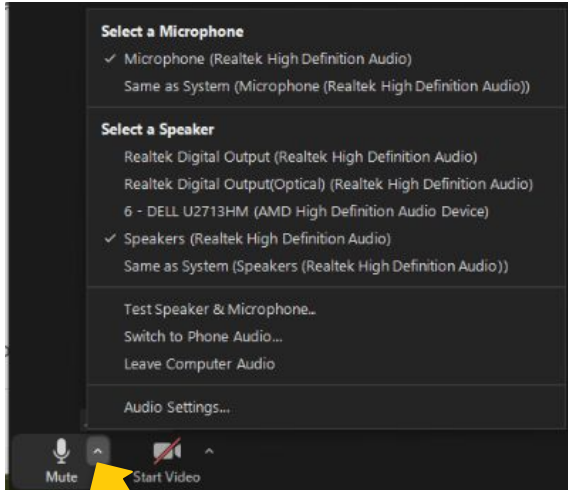
- Other Change

← Previous Next →

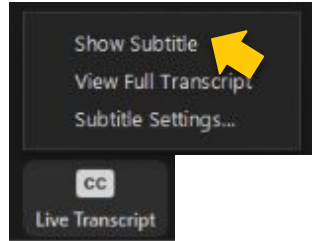
Zoom Webinar Controls

Navigating your bar on the bottom...

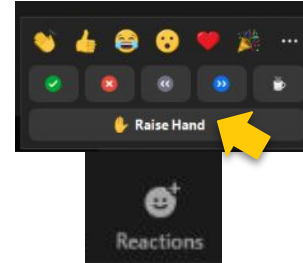
Audio Settings



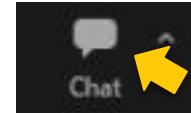
Turn on Closed Captioning



Raise Hand



Chat

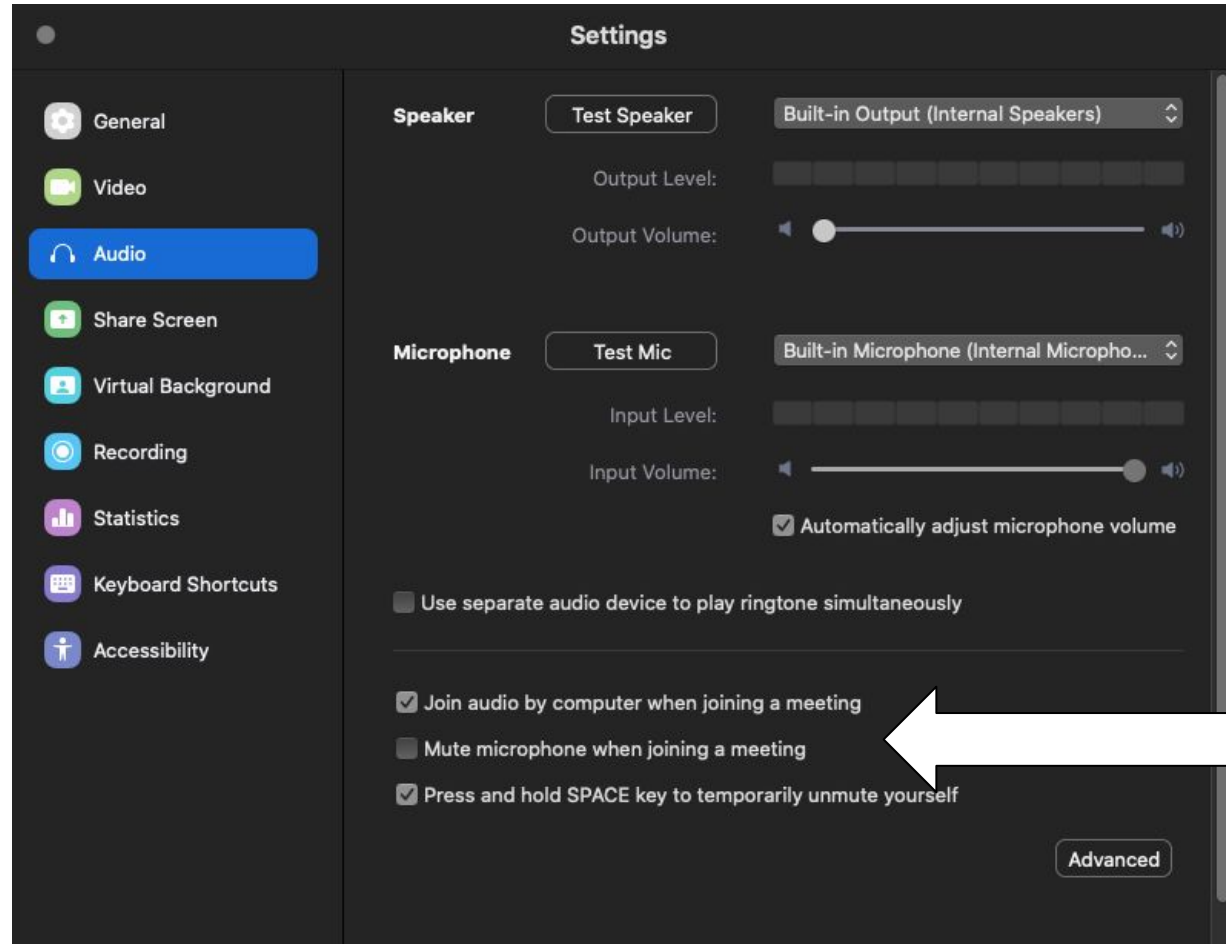


KEYBOARD SHORTCUTS TO RAISE HAND

Windows: Alt+Y to raise or lower your hand

Mac: Option+Y to raise or lower your hand

Audio Settings



The screenshot shows the Zoom application's settings window, specifically the Audio settings. On the left is a sidebar with various settings categories: General, Video, Audio (highlighted in blue), Share Screen, Virtual Background, Recording, Statistics, Keyboard Shortcuts, and Accessibility. The main panel is titled 'Settings' and is divided into two sections: 'Speaker' and 'Microphone'. The 'Speaker' section includes a 'Test Speaker' button, a dropdown menu set to 'Built-in Output (Internal Speakers)', an 'Output Level' bar, and an 'Output Volume' slider. The 'Microphone' section includes a 'Test Mic' button, a dropdown menu set to 'Built-in Microphone (Internal Micropho...', an 'Input Level' bar, an 'Input Volume' slider, and a checked checkbox for 'Automatically adjust microphone volume'. Below these sections are several checkboxes: 'Use separate audio device to play ringtone simultaneously' (unchecked), 'Join audio by computer when joining a meeting' (checked), 'Mute microphone when joining a meeting' (unchecked), and 'Press and hold SPACE key to temporarily unmute yourself' (checked). A white arrow points from the right edge of the image towards the 'Join audio by computer when joining a meeting' checkbox. At the bottom right of the settings panel is an 'Advanced' button.

Tips for successful ZOOM PARTICIPATION



MUTE your mic
when you're not
speaking



BACKGROUND
NOISE watch when
turning on mic



Limit the
DISTRACTIONS
around you



Look at the
CAMERA
not your screen



PREPARE & queue
docs or links that
you plan to share



Stay FOCUSED by
not texting or side
conversations



Use GALLERY
VIEW to see all
participants



Use CHAT 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.

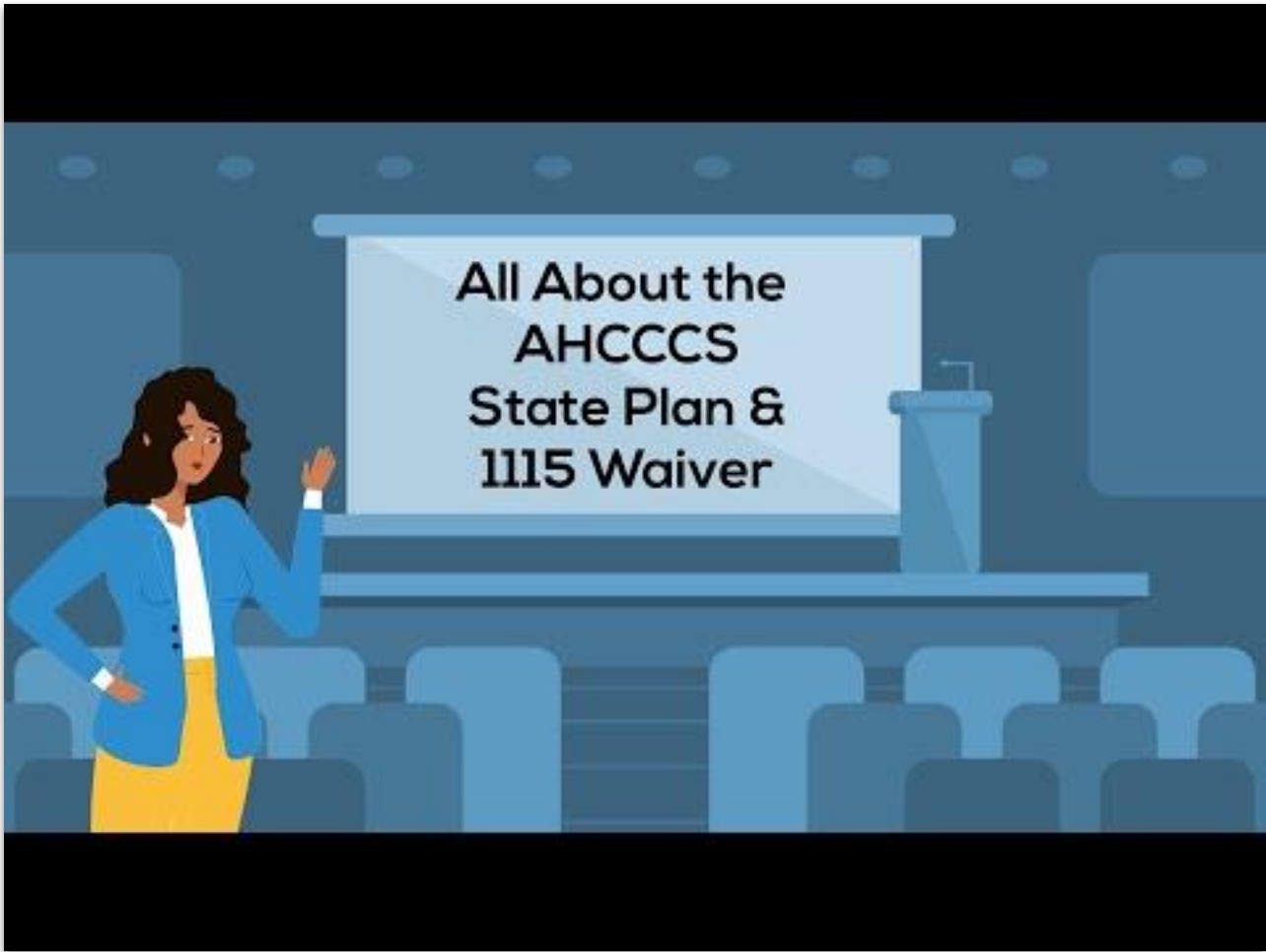


Former Foster Youth Annual Automatic Renewal Waiver Amendment

Alex Demyan, Interim Assistant Director

Division of Community Advocacy and Intergovernmental Relations





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 (H20) demonstration.

Requests Subject to Continued Negotiation:

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

Former Foster Youth Annual Automatic Renewal

Former Foster Youth Annual Automatic Renewal - 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, cooperate with child support enforcement, and apply for potential benefits.
- This is otherwise known as the 'Young Adult Transitional Insurance (YATI)' group.

Former Foster Youth Annual Automatic Renewal: What is changing?

- This request is in alignment with House Bill 2622 passed by Arizona's 55th Legislature
- Maintaining eligibility: Young Adult Transitional Insurance (YATI) eligibility will be automatically renewed without requiring additional information from the individual until the individual reaches 26 years of age.
- Effective Date: Effective upon CMS approval and completion of necessary operational and system modifications.

Former Foster Youth Annual Automatic Renewal- 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 Annual Automatic Renewal - 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 and application for potential benefits,
2. Policy-revisions,
3. Training updates and staff training on policy change, and
4. Develop and deploy communication plan.

Public Comments

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

waiverpublicinput@azahcccs.gov

AHCCCS, c/o Division of Community Advocacy and Intergovernmental Relations,
801 E. Jefferson Street, MD 4200
Phoenix, AZ 85034

Comments are received through February 27, 2023



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 across the state.

Follow & Support AHCCCS on Social Media

facebook

twitter

 Instagram

LinkedIn

 YouTube

Handle:

[@AHCCCSgov](https://www.facebook.com/AHCCCSgov)

Handle:

[@AHCCCSgov](https://twitter.com/AHCCCSgov)

Handle:

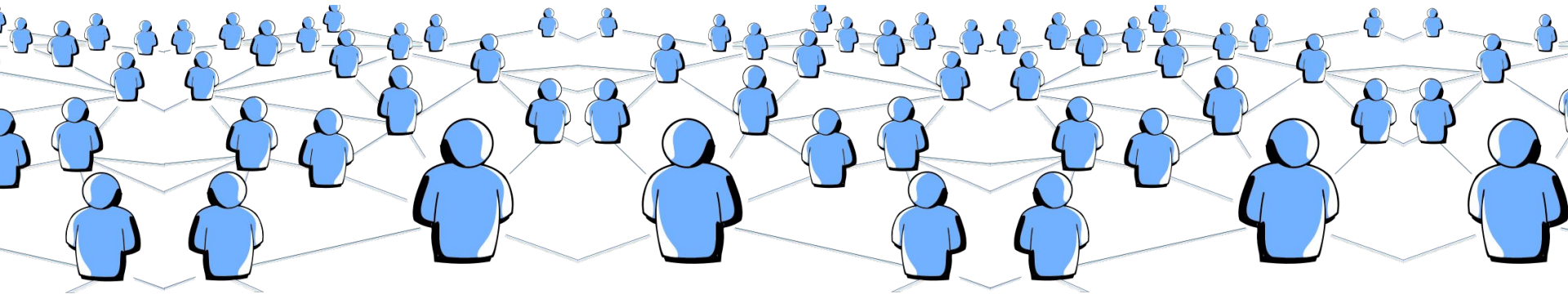
[@AHCCCSGov](https://www.instagram.com/AHCCCSGov)

Handle:

[@AHCCCS](https://www.linkedin.com/company/AHCCCS)

Channel:

[AHCCCSgov](https://www.youtube.com/channel/AHCCCSgov)



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](#)



Please take the survey

to help us better
tailor meetings to
meet your needs.



AHCCCS QUARTERLY TRIBAL CONSULTATION MEETING AGENDA

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

Date and Time: February 09, 2023 from 1:00 p.m. to 5:00 p.m. (MST)

Location: VIRTUAL ONLY

Webinar Registration Link: https://ahcccs.zoom.us/webinar/register/WN_9zmQJUu9QWCNDakehF3N5A (You will receive call-in information after registering for this meeting)

TIME	TOPIC	Presenter(s)	Reference Documents (please review ahead of TC)
1:00 PM – 1:10 PM	Welcome and Introductions	AHCCCS Staff	
1:10 PM – 1:40 PM	Behavioral Health Residential Facility/Sober Living Facilities Update	Markay Adams <i>AHCCCS Assistant Director</i>	<ul style="list-style-type: none"> • Resources for Reporting Suspicious Activity • AHCCCS Alerts Members to Targeting Activity
	<i>Tribal Consultation on BHRF/SOLF Update</i>		
1:40 PM – 1:55 PM	Issues and Key Recommendations from Tribal Health Directors	Reuben Howard	
	<i>Recommendations from Tribal Health Directors Open Discussion</i>		



TIME	TOPIC	Presenter(s)	Reference Documents (please review ahead of TC)
1:55 PM – 2:20 PM	AHCCCS Updates, including: <ul style="list-style-type: none"> AHCCCS Enrollment Numbers SFY24 Budget Submittal Overview 2022 Accomplishments 	Carmen Heredia <i>AHCCCS Director</i>	
	<i>Tribal Consultation on AHCCCS Updates</i>		
DIVISION OF COMMUNITY ADVOCACY AND INTERGOVERNMENTAL RELATIONS (DCAIR)			
2:20 PM – 2:35 PM	State Plan Amendments	Ruben Soliz <i>AHCCCS State Plan Manager</i>	<ul style="list-style-type: none"> SPA Public Notices
	<i>Tribal Consultation on State Plan Amendments</i>		
2:35 PM – 2:50 PM	1115 Waiver Discussion	Shreya Arakere <i>AHCCCS Waiver Manager</i>	<ul style="list-style-type: none"> YATI Waiver Request AHCCCS 1115 Waiver Page
	<i>Tribal Consultation on 1115 Waiver Discussion</i>		
2:50 PM – 3:00 PM	2021-2022 Annual Report on Tribal Activities	Christine Holden <i>AHCCCS Tribal Liaison</i>	<ul style="list-style-type: none"> 2021-2022 Annual Agency Report on Tribal Activities
	<i>Tribal Consultation on 2021-2022 Tribal Activities Annual Report</i>		
3:00 PM – 3:45 PM	Housing and Health Opportunities (H2O) Update	Alex Demyan <i>AHCCCS Deputy Assistant Director</i> Liz DeCosta <i>AHCCCS Housing Program Administrator</i>	
	<i>Tribal Consultation on H2O Update</i>		



TIME	TOPIC	Presenter(s)	Reference Documents (please review ahead of TC)
10 MINUTE BREAK			
DIVISION OF FEE FOR SERVICE MANAGEMENT (DFSM)			
3:55 PM – 4:05 PM	DFSM General Updates	<p style="text-align: center;">Markay Adams <i>AHCCCS Assistant Director</i></p>	
<i>Tribal Consultation on DFSM Updates</i>			
4:05 PM – 4:15 PM	American Indian Medical Home and 100% FMAP/Care Coordination Agreements Updates	<p style="text-align: center;">Leslie Short <i>AHCCCS Integrated Services Administrator</i></p>	<ul style="list-style-type: none"> • AHCCCS AIMH Page • State Health Official #16-002
<i>Tribal Consultation on AIMH and 100% FMAP/CCA Updates</i>			
4:15 PM – 4:20 PM	2024 Quality Metrics Update	<p style="text-align: center;">Ewaryst Jedrasik <i>AHCCCS Deputy Assistant Director</i></p>	
<i>Tribal Consultation on 2024 Quality Metrics Update</i>			
4:20 PM – 4:30 PM	Unwinding from Continuous Eligibility	<p style="text-align: center;">Julie Swenson <i>AHCCCS Senior Policy Advisor</i></p>	
<i>Tribal Consultation on Unwinding from Continuous Eligibility</i>			

TIME	TOPIC	Presenter(s)	Reference Documents (please review ahead of TC)
DIVISION OF GRANTS ADMINISTRATION (DGA)			
4:30 PM – 4:40 PM	AZ Crisis System Updates and 988 Implementation Progress	Andrew Medina <i>AHCCCS Crisis Administrator</i>	<ul style="list-style-type: none"> • AHCCCS Crisis Website • Crisis Stabilization Facility Map • AHCCCS Crisis Services FAQs • 988 Fact Sheet • Arizona Suicide Prevention Website • ADA 911 Program
<i>Tribal Consultation on AZ Crisis System Updates and 988 Implementation Progress</i>			
DIVISION OF HEALTH CARE MANAGEMENT (DHCM)			
4:40 PM – 4:50 PM	Differential Adjusted Payments (DAP) CYE 2024	Margaret Hackler <i>AHCCCS Value Based Purchasing Manager</i>	<ul style="list-style-type: none"> • CYE24 DAP Preliminary Public Notice
<i>Tribal Consultation on Unwinding from Continuous Eligibility</i>			
4:50 PM – 5:00 PM	Policy Updates	Megan Woods <i>AHCCCS Integrated Services Administrator</i> Leslie Short <i>AHCCCS Integrated Services Administrator</i>	<ul style="list-style-type: none"> • AHCCCS Public Comment Portal
<i>Tribal Consultation on Unwinding from Continuous Eligibility</i>			
5:00 PM	Announcements & Adjourn	AHCCCS Staff	<ul style="list-style-type: none"> • AHCCCS Tribal Consultation Calendar



State Medicaid Advisory Committee (SMAC)

Quarterly Meeting
Wednesday, Jan 11, 2023
(VIRTUAL MEETING)
1:00 p.m. - 3:00 p.m.

(To Join by Web)

[SMAC Meeting Link](#)

Webinar ID: 831 6505 0454

Password: SMAC2023!

(To Join by Phone)

877 853 5257 (Toll Free)

Meeting ID: 831 6505 0454 **Passcode:** 840617815

Agenda

I. Attendance and Quorum Confirmation	All
II. Welcome	Jami Snyder, AHCCCS Director
III. AHCCCS Updates	Jami Snyder, AHCCCS Director
IV. 2023 Legislative Forecast	Damien Carpenter, Legislative Liaison
V. Update on Follow Up Activities from 2022 Legislative Session	Kyle Sawyer, Senior Project Manager
XI. American Rescue Plan (ARP) and Home and Community Based Services (HCBS) Update	Alex Demyan, Deputy Assistant Director
XII. State Plan Amendments	Ruben Soliz, Federal Relations & Health Policy Advisor
XIII. Waiver Update	Shreya Arakere, Federal Waiver and Evaluation Administrator
IX. AHCCCS Provider Enrollment Update	Patricia Santa Cruz, Provider Enrollment Administrator
X. Division of Fee for Service Management Updates	Markay Adams, Assistant Director
XI. AZ Crisis System Updates and 9-8-8 Implementation Progress	CJ Loiselle, Deputy Assistant Director
XII. Medicaid Enterprise System Roadmap Update	Daniel Lippert, Assistant Director
XIII. AHCCCS Policy Updates	Danielle Ashlock, Project Manager, Brandi Howard, Medical Management Manager, and Dr. Melissa Del-Colle, Senior Program Administrator
XIV. Call to the Public	Jami Snyder, AHCCCS Director
XV. 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.



OIFA Advisory Council Agenda

Tuesday, January 17, 2022 10:30 AM - 12:00 PM

Zoom Registration

<https://ahcccs.zoom.us/meeting/register/tZwsc-ipcTluHdJzWACZXXGOT8-tP8kTy4ah>

Purpose:

OIFA Advisory Council purpose is to bring together leadership of peer and family behavioral health service providers and peer and family advocacy groups to influence system structures and policies and to benefit from regular contact with each other and with AHCCCS Leadership.

Introductions of first time attendees	10:30 - 10:35
Approve December Minutes	10:35 - 10:40
AHCCCS OIFA Updates	10:40 - 10:50
<ul style="list-style-type: none"> ● Peer Support, Chaz ● OIFA 3.0 Summit, Susan ● Children's BH Liaison, Cynthia ● Upcoming events, Austin <ul style="list-style-type: none"> ○ Waiver Amendment Forum on Former Foster Youth Annual Automatic Renewal <ul style="list-style-type: none"> ■ Monday, January 23, 2022 from 11:00 a.m.-noon ■ Registration ○ OIFA Health Care Navigation <ul style="list-style-type: none"> ■ Tuesday, January 24, 2022 from noon-12:30 p.m. ■ Registration ○ Office of Human Rights: Why Assess for Special Assistance for Individuals Living with a Serious Mental Illness? <ul style="list-style-type: none"> ■ Thursday, January 26, 2022 from 3:00-4:30 p.m. ■ Registration ○ Housing and Health Opportunities (H2O) Waiver Forum <ul style="list-style-type: none"> ■ Tuesday, January 31, 2022 from 11:00 a.m.-noon ■ Registration ○ 12 Guiding Principles Forums <ul style="list-style-type: none"> ■ Tuesday, January 31, 2022 from 1:00 p.m. -2:00 p.m. (Registration) ■ Wednesday, February 1, 2022 from 6:00 p.m. -7:00 p.m. (Registration) ■ Thursday, February 2, 2022 from 11:00 a.m. -noon (Registration) 	
Tony Smith Recognition Award Formation of workgroup	10:50 - 11:00
Community Updates PFCA, Hayley Winterberg AZPFC, Kathy Bashor	11:00 - 11:30

NAPFC, Laurie Verdier
Veterans, Geoff Davis
NAMI, Sherry/Jim

AHCCCS Updates
Dana Flannery, Assistant Director

11:30 - 12:00

Next Meeting February 21, 2022



OIFA Advisory Council Agenda

Tuesday, February 21, 2023 10:30 AM - 12:00 PM

Zoom Link

<https://ahcccs.zoom.us/j/88141179476?pwd=LzhhcmxqaUpzZ3Q3bmdiSkZieGZCdz09>

Purpose:

OIFA Advisory Council purpose is to bring together leadership of peer and family behavioral health service providers and peer and family advocacy groups to influence system structures and policies and to benefit from regular contact with each other and with AHCCCS Leadership.

Introductions of first time attendees	10:30 - 10:35
Approve January Minutes	10:35 - 10:40
Former Foster Youth Waiver Amendment Shreya Arakere, Federal Waiver and Evaluation Administrator	10:40 - 10:50
DSL Presentation Kimberly Craig, CEO CHR	10:50 - 11:10
AHCCCS OIFA Updates	11:10 - 11:20
<ul style="list-style-type: none">● Waiver Letter of Recommendation, Susan● Peer Support Employment Training Programs, Chaz● Upcoming events, Cynthia<ul style="list-style-type: none">○ Waiver Amendment Forum on Former Foster Youth Annual Automatic Renewal<ul style="list-style-type: none">■ Wednesday, February 22, 2023 from 3:00 p.m.-4:00 p.m.■ Registration○ OIFA Health Care Navigation<ul style="list-style-type: none">■ Tuesday, February 28, 2023 from noon-12:30 p.m.■ Registration○ Office of Human Rights Training Session: Rights of Individuals Living with a Serious Mental Illness (SMI)<ul style="list-style-type: none">■ Tuesday, February 28, 2023 from 9:00 a.m. -10:30 a.m.■ Registration○ 12 Guiding Principles Forums<ul style="list-style-type: none">■ Tuesday, February 21, 2023 from 3:00 p.m. -4:00 p.m. (Registration)■ Wednesday, February 22, 2023 from 6:00 p.m. -7:00 p.m. (Registration)■ Thursday, February 23, 2023 from 9:00 a.m. -10:00 a.m. (Registration)○ Jacob's Law Training<ul style="list-style-type: none">■ Thursday, February 23, 2023 from 6:00 p.m. -8:00 p.m.■ Registration	

Community Updates 11:20 - 11:30
PFCA, Hayley Winterberg
AZPFC, Kathy Bashor
NAPFC, Laurie Verdier
Veterans, Geoff Davis
NAMI, Sherry/Jim

AHCCCS Updates 11:30 - 12:00
Carmen Heredia, Director

Next Meeting March 21, 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.
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APPENDIX C

Waiver Amendment Public Comment Letters



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

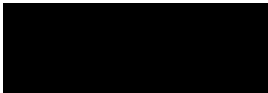
Speaking Up for Home and Hope

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

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





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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



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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 Coallo 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

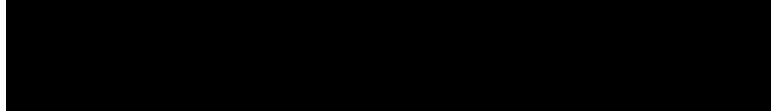
For all the above reasons, the William E. Morris Institute for Justice supports Arizona's proposed 1115 demonstration waiver. The demonstration waiver and the implementation of HB 2622 will promote the objectives of the Medicaid program and

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,



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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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

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Improvement Institute

Arizona Pediatric COVID-19 Training
Center

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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.

In Partnership

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