

# Out of State Former Foster Youth Interim Evaluation Report

## 1) Historical Narrative:

On May 19, 2017, the Department of Health Care Services (DHCS) submitted a Medi-Cal 2020 Demonstration Waiver amendment proposal with Attachment QQ (the evaluation design) to the Centers for Medicare and Medicaid Services (CMS) to continue coverage for California's former foster care youth (FFY) under age 26, who were in foster care under the responsibility of a different state's Medicaid program at the time they turned 18 or when they "aged out" of foster care. In compliance with the requirements of the Medi-Cal 2020 Demonstration Special Terms and Conditions (STCs), DHCS gave public notice of this amendment through the following channels:

- Stakeholder meetings on December 8, 2016; January 12, 2017; February 9, 2017; March 9, 2017; and May 11, 2017
- Stakeholder call on April 26, 2017
- Notice was posted to the DHCS website on May 1, 2017
- Distribution through DHCS listserv(s) and Medi-Cal 2020 Newsletter on May 1, 2017

On April 14, 2017, CMS accepted DHCS' written rationale for no tribal consultation or publication.

No stakeholder questions or comments were received prior to submission of the waiver amendment request to CMS.

On August 18, 2017, CMS approved a waiver amendment to the Medi-Cal 2020 Demonstration to allow DHCS to continue providing Medicaid coverage for out of state (OOS) FFY under age 26 consistent with federal requirements for coverage of this population. Given the waiver amendment, eligibility and enrollment processes were not interrupted for individuals eligible under this coverage category.

On September 8, 2017, in a letter to CMS, DHCS accepted the STCs for the OOS FFY Amendment. In compliance with the STCs, DHCS publicly shared acceptance of the amendment through the following channels:

- FFY stakeholder meetings on September 14, 2017, November 9, 2017, and January 11, 2018.
- Stakeholder call on August 23, 2017, September 27, 2017, and October 1, 2017.
- Notice was posted to the DHCS Medi-Cal 2020 Demonstration Amendments website.
- The amended STCs were posted to the to DHCS Medi-Cal 2020 Demonstration Waiver STCs website.

No stakeholder questions or comments were received regarding the approval of this waiver amendment request to CMS.

CMS approved and accepted Attachment QQ for the amendment to the Medi-Cal 2020 Demonstration for the OOS FFY population on December 22, 2017. The evaluation design draft used the most current data from 2015. Data used for Attachment QQ for Demonstration Year (DY) 13 was from 2016 and data used for DY 14 was from 2017 in compliance with CMS instructions.

## **2) Key Findings Summary:**

### **a. Accomplishments:**

- i. California was the first state approved by CMS under the 2020 Waiver to provide continuous Medi-Cal eligibility to FFY who were in foster care in a state other than California. Under the FFY Program, the OOS FFY under age 26 who qualify consistent with the federal requirements, continued to receive full scope benefits in Medi-Cal until they turn 26. These youths do not have to re-apply for Medi-Cal until they age out of the program. At age 26, they are fully reassessed to determine if they are eligible for any other Medi-Cal programs.

### **b. Utilization Data**

- i. California successfully increased enrollment of FFY in Medi-Cal by 3,600 and OOS FFY by 80 from 2016 to 2017, providing these youths with access to full-scope Medi-Cal benefits.

### **c. Increased Access to Care**

- i. In 2017, the FFY population continued to show greater use of emergency department (ED) visits (emergency room visits) and behavioral health visits when compared to the 18 to 25 year old, inclusive, Medi-Cal population. Quality measures for Chlamydia Screening in Women (CHL) and Cervical Cancer Screening (CCS) also continued to be accessed more by the FFY group than by the 18 to 25 year old, inclusive, Medi-Cal population.

## **3) Limitations of the Evaluation:**

FFY are a group of individuals who move often, and are accustomed to having their health care requirements taken care of by the foster care system and/or caretakers. OOS FFY new to California will have limited knowledge on where to access health care resources. These youths may also be unaware that California offers Medi-Cal for the FFY from ages 18 to 25, inclusive, until they are in need of services.

Administratively, California lacks the ability to track OOS FFY entering or exiting the state or transitioning to other programs. Many FFY are also eligible for other programs that offer cash aid in addition to Medi-Cal. When these youths lose their eligibility for the cash aid programs, they are not always placed back into the FFY program, potentially creating a gap in their Medi-Cal coverage. DHCS is working on developing a system flag to assist counties in identifying FFY in these cases, in an effort to prevent any gaps in Medi-Cal coverage.

#### **4) Changes in Federal Law**

On October 24, 2018, Congress passed the Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment (SUPPORT) for Patients and Communities Act. Section 1002 of the SUPPORT Act (H.R.6), Health Insurance for Former Foster Youth, extends Medicaid coverage for the OOS FFY regardless of the state they were in when they were in foster care. This amendment becomes effective for all OOS FFY who attain 18 years of age on or after January 1, 2023.

#### **5) Request for Waiver Extension**

DHCS is requesting the 2020 Waiver for the OOS FFY be extended to January 1, 2023, to coincide with the implementation of HR 6 Section 1002 to prevent any gaps in Medicaid coverage.