

ICAMA Form 7.01 (Proposed)

State Comments
AAICAMA Responses

IMPORTANT: ICAMA Forms are not meant to eliminate or substitute for state-to-state communication.



Association of Administrators of the Interstate Compact on Adoption and Medical Assistance

| State | State Comment | AAICAMA Response |
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| CALIFORNIA | <p>The 7.01 asks only for date requested for Medicaid opening-does this mean the date Adoption Assistance (AA) state is closing Medicaid and/or the date the family will be in the new state? Please clarify.</p> | <p>The effective date for the opening of the Medicaid case is now the first line of the form 7.01.</p> <ul style="list-style-type: none"> • It is inferred that the Medicaid has been closed in the AA state on that date. • However, states’ consensus is that the Medicaid closing date should be retained to eliminate and readily show any coverage gaps in the child’s Medicaid receipt due to the resident state’s internal Medicaid administrative processes. <p>Result: Date of Medicaid Closing will be included on the 7.01</p> <p>However, regardless of the dates on the 7.01, federal law requires that the resident state must provide Medicaid to an AA (Adoption Assistance) or GAP (Guardianship Assistance Program) eligible child upon residence in the new state. Title IV-E AA/GAP and state-funded AA-eligible children (placed into COBRA-reciprocity states) are continuously eligible for Medicaid receipt from the resident state. (i.e., without any interruption as a result of interstate placements/moves)</p> <p>Training /education to be provided at AAICAMA’s annual conference (May 2012 in Orlando, FL) and other venues. AAICAMA will also hold strategic consultations with Center for Medicare and Medicaid Services (CMS) and Medicaid offices to educate their staff on this issue. States will be asked participate in this project through committee work.</p> |



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| DELAWARE | <p>Delaware would like 'To' and 'From' on front of 7.01 to eliminate need for cover letter.</p> | <p>States report that this change would add to the ease of using the 7.01 form. The revised 7.01 will move Section B (Referral Information) to just under the 'Date Requested for Medicaid Opening'. This should eliminate the need for a cover letter.</p> <p>Result: The revised 7.01 will move Section B (Referral Information) to just under the 'Date Requested for Medicaid Opening'.</p> <p>NB: The same change will be made on the proposed 7.03.</p> <p>Practice Note: ICAMA Forms were designed to provide all information necessary to stand alone—a cover letter provides redundant information and increases the work for sending administrator.</p> |
| ILLINOIS , NEW HAMPSHIRE | <p>Name changes in adoptive placements can be confusing.</p> <hr/> <p>Name changes are an issue when an adoptive placement in NH is finalized and an ICAMA 7.01 is sent with adoptive name and NH has the placement name on file.</p> <hr/> <p>'Legal Name' is confusing. Please clarify.</p> | <p>The intent of the addition of the phrase 'Legal Name' in Section A is to ensure that the Name on the 7.01 form is the name associated with the <u>required</u> Social Security Number (SSN). The <u>SSN</u> and the <u>Name</u> are those on file with the Social Security Administration (SSA) who issued the SSN to the child.</p> <p>Medicaid cross-checks Child's SSN and name and these must match the SSA information to open a Medicaid Case in the resident state with</p> <p>AAICAMA will add information to the 'Important Information for Families' (ICAMA 7.02b) to help parents understand the need to inform the Adoption Assistance state and the residence state of any changes in the child(ren)'s names or SSNs.</p> <p>AAICAMA will also address this through education and training.</p> |



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| <p style="text-align: center;">INDIANA, NEW MEXICO, UTAH</p> | <p>States use different coding for Medicaid for Foster Care and Adoption Assistance. When an adoptive placement is made but not the adoption is not yet finalized these states use Foster Care dollars to provide Medicaid. When the adoption is finalized these states change their coding and use Adoption Assistance dollars to provide Medicaid.</p> <p>How can these states know how to code an incoming ICAMA child?</p> | <p>This issue is beyond the purview of the ICAMA (Interstate Compact on Adoption and Medical Assistance) which focuses solely on facilitating uninterrupted Medicaid provision to Adoption Assistance (AA) or Guardianship Assistance Program (GAP) eligible children who move between states. Medicaid coding appears to be an internal state-specific issue that ICAMA cannot satisfactorily address.</p> <p>Result: No change will be made to the proposed 7.01 form at this time. AAICAMA will continue to research the issue.</p> |
| <p style="text-align: center;">INDIANA, NEW MEXICO, UTAH</p> | <p>States use different coding for Medicaid for Foster Care and Adoption Assistance. When an adoptive placement is made but not the adoption is not yet finalized these states use Foster Care dollars to provide Medicaid. When the adoption is finalized these states change their coding and use Adoption Assistance dollars to provide Medicaid.</p> <p>How can these states know if the ICAMA form is for a child who has been in foster care and whose placement has converted to adoptive?</p> | <p>A search of state databases using the child’s SSN should indicate to the new state ICAMA administrator that the child is currently a resident of their state and whether a Medicaid case is already open.</p> <p>However, the coding issue applies to title XIX Medicaid dollars not title IV-E “foster care or adoption assistance dollars.”</p> <ul style="list-style-type: none"> • The Compact’s key concern is with is adoption/guardianship assistance- eligible children’s receipt of Medicaid in interstate placements or moves. Unless this issue creates errors, delays, or denial of Medicaid, this is an internal issue. <p>However, AAICAMA is aware that a child’s name and/or SSN may be legally changed at some point during the adoptive process. AAICAMA will consult with state ICPC and ICAMA offices, and CMS (Center for Medicare and Medicaid Services) to determine how this issue can be resolved.</p> <p>Result: No change can be made to the proposed 7.01 form at this time.</p> |



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| <p>MICHIGAN</p> | <p>State is anticipating system upgrades that will require SSNs (Social Security Numbers) and DOB (Date of Birth) for adoptive parent/guardian. Can this information be added to the forms?</p> | <p>This information is unnecessary for the purposes of opening a Medicaid case for an eligible AA or GAP child in the resident state and therefore, unnecessary to the administration of the ICAMA. Medicaid law only requires the child’s SSN to open a Medicaid case. This is also a confidentiality issue for the parents/guardian.</p> <p>As this is state-specific policy. It is left to the state to contact the parents for this information.</p> <p>Result: No change will be made to the proposed 7.01.</p> |
| <p>MISSISSIPPI</p> | <p>We suggest that placing the family information below the Medicaid opening date will help states to identify pre-existing family entered in their system.</p> | <p>Consultation with States indicated that it should always be the child’s information that is searched in the state’s system. Family information is not always identical to the child’s and may not resolve this issue.</p> <p>Result: No change will be made to the proposed 7.01.</p> |
| <p>NEW YORK</p> | <p>What is AAICAMA’s legal authority that allows the inclusion of title IV-E GAP (Guardianship Assistance Program) information on the proposed forms?</p> | <p>Under the Compact members may acting together may deal with interstate issues related to the ICAMA. Article VI of the ICAMA states:</p> <p>‘Acting jointly, the Compact Administrators shall develop uniform forms and administrative procedures for the interstate monitoring and delivery of adoption and medical assistance benefits and services pursuant to this Compact. The forms and procedures so developed may deal with such matters as:</p> <ul style="list-style-type: none"> (1) Documentation of continuing adoption assistance eligibility; (2) Interstate payments and reimbursements; and (3) Any and all other matters arising pursuant to this Compact.’ <p>Result: A formal response is being written. AAICAMA will add this information to training.</p> |



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| MARYLAND | <p>In 'From' and 'To' section B. there is no suggestion/direction as to who the ICAMA referral is from-e.g., 'From' State Office in Sending State or 'To' (State Office in RS or SS?). In MD, local worker completes, 'certifies', signs and forwards form (i.e., referral is 'From' the cty/local office) – this info used to be captured on 600 series. Perhaps additional breakdown is needed such as the name, agency, mailing address, tel. no., fax no., e-mail address of the adoption Worker in the AA state and same for receiving State in addition to the State Central Office ICAMA administrator.</p> <p>Would also suggest this revision to each form that references 'From' and 'To' (i.e., in 7.03 D), especially where an 'Approval' and 'Denial' decision is requested on Medicaid extension. These are typically State Central office functions.</p> | <p>The procedures for the administration of the ICAMA were established with the enabling process in each member state. See:</p> <p><u>'ARTICLE VI. COMPACT ADMINISTRATION</u></p> <p>(a) ... The Compact Administrator shall coordinate all activities under this Compact within his or her state. The Compact Administrator shall also be the principal contact for officials and agencies within and without the state for the facilitation of interstate relations involving this Compact and the protection of benefits and services provided pursuant thereto. In this capacity, the Compact Administrator will be responsible for assisting child welfare agency personnel from other party states and adoptive families receiving adoption and medical assistance on an interstate basis.'</p> <p>Therefore the 'From' and 'To' always refer to the designated ICAMA administrator in each member state.</p> <p><u>Result:</u> However, to recognize that this presents administrative difficulties in some county administered states, the field 'County (<i>if known</i>)' has been added to the Family Address to assist the ICAMA administrator.</p> |
| MARYLAND | <p>Have states send 2 copies, not one copy of the forms. This is required by some states.</p> | <p>States have different needs for the number of copies of ICAMA forms. Since this is a state-specific, internal requirement for some states, AAICAMA cannot ask all states to provide additional copies. Therefore, if a state requires additional copies of a form they are asked to make them for their own use.</p> <p><u>Result:</u> No change will be made to the proposed 7.01.</p> |



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| NEW YORK | What is AAICAMA's legal authority that allows the inclusion of title IV-E GAP (Guardianship Assistance Program) information on the proposed forms? | <p>Under the Compact members may acting together may deal with interstate issues related to the ICAMA. Article VI of the ICAMA states:</p> <p>'Acting jointly, the Compact Administrators shall develop uniform forms and administrative procedures for the interstate monitoring and delivery of adoption and medical assistance benefits and services pursuant to this Compact. The forms and procedures so developed may deal with such matters as:</p> <ul style="list-style-type: none">(1) Documentation of continuing adoption assistance eligibility;(2) Interstate payments and reimbursements; and(3) Any and all other matters arising pursuant to this Compact.'<p>Result: AAICAMA will add this information to their trainings.</p> |
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| <p>?</p> | <p>Add SSI (Supplemental Security Income) to the eligibility section.</p> | <p>The new state does not need this information. (i.e., that SSI may be the basis for title IV-E eligibility). ICAMA forms are designed to certify that the eligibility as determined by the Adoption Assistance state is federally compliant. ICAMA member states receiving the ICAMA 6.01 (or the 7.01 once the final version is ratified) accept this eligibility as indicated and may not 'look behind' to the process of eligibility determination.</p> <p>If the new state needs this information for some other purpose; they are encouraged to email or call the ICAMA administrator in the Adoption Assistance state.</p> <p>Result: SSI eligibility will not be added to the proposed 7.01</p> <p>In addition AAICAMA will offer training on SSI eligibility. When a child is determined eligible for state-funded AA but has an obvious, severe disability, eligibility for SSI should be evaluated. Discussions with CMS indicate that states are legally required to pursue <u>ALL</u> possible other eligibilities for title XIX Medicaid when title XIX Medicaid closes under a specific eligibility category.</p> <p>AAICAMA will work with states to increase understanding of this issue. AAICAMA will also consult with CMS to ensure proper understanding of SSI eligibility.</p> |
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