

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

Dear Administrator Chiquita Brooks-LaSure,

We are writing to request The Center for Medicare and CHIP Services issue new guidance related to Youth Peer Support. To date, CMS has not issued guidance focused solely on Youth Peer Support. In 2007, CMS released guidance on peer support, but did not call out youth peer support specifically. Youth peer services were mentioned in a 2013 joint CMCS and SAMHSA informational bulletin focused on behavioral health services for children, youth, and young adults, but were not the primary focus of the bulletin.

In both cases, current CMS guidance focuses primarily on how peer support can be integrated into clinical settings. However, increasing access to youth peer support services in schools would be transformative for young people. Creating Youth Peer Support programs in schools could reimagine school-based health programs by tapping into a trusted, diverse, and available workforce. However, students deserve true peers, including young people who are of a similar age.

Many schools are developing youth peer support programs, including a large pilot program in [California](#). However, sustaining these programs will be challenging without Medicaid funding. CMS must clarify how school-based Medicaid could be used to fund youth peer support programs in schools and ensure that the guidance reflects the unique needs of youth peer supporters, recognizing how they differ from adult and family peers.

Young people are [experiencing](#) a mental health crisis. At the same time, the mental health system is experiencing a behavioral health workforce shortage, with many young folks unable to access care, particularly in mental health deserts—geographic areas with no or limited access to mental health services like psychologists and counselors. Further, many young people, particularly those that identify as Black, brown, and Indigenous, 2SLGBTQIA+, and with a disability, are [distrustful](#) of the mental health system.

Youth peer support offers a solution to all these problems: peer support is a non-clinical practice that taps into a new provider workforce – peers. Research [shows](#) peer support is an effective and equitable practice. For these reasons, we believe youth peer support should be a critical component of school-based mental health programs.

Youth Peer Support is distinct from adult peer support, family peer support, and other forms of peer

support. Youth Peer Support deserves its own infrastructure that acknowledges that youth peer support requires age peers, that young people often view recovery differently from adults, and that youth peer support must center youth voice and youth decision-making.

Despite the promise of youth peer support, it remains unavailable to most young people and is generally concentrated in grant-funded programs. Many states choose to forgo Medicaid dollars to fund Youth Peer Support due to a lack of clarity around Medicaid policies on Youth Peer Support.

CMS can clarify these perceived barriers by releasing Youth Peer Support guidance that addresses the following:

- Encourages states to allow for youth peer supporters to work in school-based settings and bill school-based Medicaid.
- Clarifies that young people 16-26 can be certified as youth peer support providers. Young people are already informally providing youth peer support with their peers, friends, and family. We urge policymakers, stakeholders, and states to acknowledge that young people are intelligent, professional, and ethical. No research suggests that youth peer support specialists are unable to follow the same code of ethics or professional standards as older peer supporters.
- Specifies the minimal level of documentation required for reimbursement.
- Removes guidance around coordinated care and instead recognizes youth peer support as a preventative service, a supplement to clinical care, and a service in and of itself.
- Encourages states to create separate billing codes for youth peer support and family peer support and encourages states to create Transition Age Youth (TAY)-specific codes that can be used in both the child- and adult-serving systems.
- Encourages peers to be supervised by fellow peers and recommends youth-specific supervision for youth peer workers.

Updated CMS guidance on Youth Peer Support will allow state peer support offices to expand access to Medicaid-funded YPS services, ensuring that more young people receive the care they want and need.

More information on how CMS can support access to Youth Peer Support can be found in CLASP's [report](#) "Giving the (Young) People What they Want: A Policy Framework for Youth Peer Support."

In conclusion, releasing guidance specific to youth peer support with the recommendations above would be an important step to support young people's well-being at a critical time in their lives. Thank you for your consideration. If you have any questions or would like to discuss further, please contact Kayla Tawa at ktawa@clasp.org.

Sincerely,

Active Minds

American Association for Psychoanalysis in Clinical Social Work

American Mental Health Counselors Association

Anxiety and Depression Association of America

California Children's Trust

California Coalition for Youth

California School-Based Health Alliance

Center for Law and Social Policy

Children Now

First Focus on Children

Global Alliance for Behavioral Health and Social Justice

Inseparable

International Society of Psychiatric Mental Health Nurses

MomsRising

National Alliance on Mental Illness

National Federation of Families

National Network for Youth

National Register of Health Service Psychologists

Psychotherapy Action Network

National Federation of Families

National Register of Health Service Psychologists

Psychotherapy Action Network

Public Works Alliance

The Children's Partnership

The Kennedy Forum

The Los Angeles Trust for Children's Health

The National Alliance to Advance Adolescent Health

Youth MOVE National

Youth Villages

