

<b>State</b>	<i>Ohio</i>
<b>Demonstration name</b>	<i>Group VIII Work Requirement and Community Engagement 1115 Demonstration Waiver</i>
<b>Approval date</b>	<i>March 15, 2019</i>
<b>Approval period</b>	<i>March 15, 2019 – February 29, 2024</i>
<b>Implementation date</b>	<i>January 1, 2021</i>
<b>Demonstration Year</b>	<i>Demonstration Year 1: March 15, 2019 – February 29, 2020</i>
<b>Reporting Period</b>	<i>Waiver Quarter: 1/2019</i>

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## Executive Summary

Since approval of Ohio's *Group VIII Work Requirement and Community Engagement Demonstration* on March 15, 2019, the Ohio Department of Medicaid (ODM) has developed a comprehensive strategy to prepare for go-live on January 1, 2021. A work plan has been developed to provide a roadmap for program development and implementation (see Attachment).

For this reporting period, the activities broadly range from developing program design specifications and identifying necessary system updates to drafting the requisite documents described in the Special Terms and Conditions (STCs), including the Implementation Plan and Evaluation Design documents, and complementary resources such as a Communications Strategy. ODM has engaged sister agencies, stakeholders, and Medicaid staff in another state with a similar demonstration to support this work.

This Quarterly Monitoring Report documents the activities to date, operational decisions, outstanding issues, and potential challenges and barriers. Considering implementation does not occur until January 1, 2021, this and other Quarterly Monitoring Reports submitted prior to Program go-live will provide a general operational status update, rather than documenting all components described in STC 35 (e.g., performance metrics) and outlined in CMS Monitoring Report guidance that are not yet relevant. ODM remains committed to transparency and oversight and will continue to work with CMS to summarize appropriate and relevant information in this and future monitoring reports.

## Program Design

ODM has identified the different roles and responsibilities for Ohio County Department of Job and Family Services (CDJFS) caseworkers and Managed Care Plans (MCPs) in the work and community engagement requirement (Requirement) program design. CDJFS caseworkers will play a key role in program operations, including conducting the beneficiary appraisal and serving as the main point of contact with the Group VIII beneficiary during the appraisal process. The MCPs will focus on providing information regarding program requirements, answering questions, and connecting members to CDJFS offices and available support as necessary.

The following information provides a high-level overview of the current system and process designs.

- ODM will leverage existing systems to identify Group VIII beneficiaries who must meet the Requirement to maintain Medicaid eligibility.
- The Ohio Benefits eligibility system will evaluate all Group VIII beneficiaries by conducting an automatic review of available data to determine their status as it relates to the Requirement and will pre-populate a Notice of Action (NOA) with one of the following categories: 1) mandatory; 2) exempt; or 3) meets good cause exception, and the exception end date, as appropriate.

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- Group VIII beneficiaries who must meet the Requirement to maintain Medicaid eligibility will be mailed a self-appraisal form no later than two days following the date of Medicaid approval. Beneficiaries will complete the self-appraisal form noting the following information: 1) whether supports are needed to meet the Requirement; 2) whether there are barriers to completing Requirement activities; 3) whether they meet an exemption; 4) whether they meet a good cause exception; or 5) whether they are participating in activities that meet the Requirement. The completed form will be sent to the local CDJFS office. If the beneficiary timely submits a signed self-appraisal form and identifies an exemption or a good cause exception, an updated NOA is sent noting either compliance with the Requirement, exemption from the Requirement, or notice of good cause exception.
- If the beneficiary does not return a signed self-appraisal form within the required timeframe (within 10 days of the mailing date of the second notice) or does return the signed self-appraisal form and does not identify an exemption or good cause exception, the CDJFS caseworker will attempt to contact the beneficiary to schedule an appraisal interview. If contact is made, the CDJFS caseworker will discuss the Requirement and determine whether the beneficiary meets the Requirement, qualifies for an exemption or good cause exception, or whether additional work and community engagement activities are needed to satisfy the Requirement. As appropriate, a NOA will be sent to the beneficiary noting the outcome.
- The state will modify the current standard renewal process to determine ongoing compliance with the Requirement by including information regarding the beneficiary's compliance status.
- If the beneficiary is not compliant with the Requirement or voluntarily chooses to disenroll from Medicaid, the CDJFS caseworker will make a series of outbound calls to the beneficiary prior to proposing termination of the individual's eligibility. These outbound calls will continue until the CDJFS caseworker makes contact with the beneficiary and will be used to reinforce the importance of compliance with the Requirement, as well as to collect additional information regarding potential exemptions and/or good cause exceptions the beneficiary may meet.
- ODM will include language in the NOA and renewal package that clearly describes the risk and implications of benefit termination.

Process flows have been developed to note the progression of how beneficiaries move throughout the process. The process flows will be updated, and new process flows will be developed, as the design features are fine-tuned.

## Implementation Plan

STC 33 requires submission of an Implementation Plan to CMS within 90 calendar days of demonstration approval (by June 13, 2019). As noted throughout this document, there are several activities underway to ensure a successful implementation that also are required to be described in the Implementation Plan (e.g., communication strategies). Shortly after Demonstration approval, ODM determined that more time was needed to draft a meaningful Implementation Plan that describes in adequate detail the broad range of CMS-required metrics, such as application assistance, reporting processing, and appeals. For this reason, ODM requested an extension for submission of the Implementation Plan. Per CMS's approval, ODM will submit the Implementation Plan to CMS on or before October 11, 2019. ODM plans to solicit feedback from key partners, including the Ohio Department of Job and Family Services (ODJFS), prior to submitting the Implementation Plan.

## Communication Strategy

ODM is committed to a meaningful communication strategy that will engage and timely educate key stakeholders regarding the Requirement and implementation activities. A comprehensive communication plan is under development that will identify key stakeholders, both internal and external, and provide a roadmap for the appropriate messaging, timing of messaging, and mode of delivery for each stakeholder. As part of the communication plan, ODM intends to use various modes of online, print, and social media platforms to provide updates regarding the status of program implementation. ODM expects to complete the communication plan by September 13, 2019, a summary of which will be included in the Implementation Plan.

ODM staff meet monthly with ODJFS staff regarding Requirement design and implementation issues. Additional opportunities to gain feedback from stakeholders and to educate stakeholders are being developed.

## Evaluation Design

STC 44 requires submission of a draft Evaluation Design to CMS for review within 180 calendar days of Waiver approval. ODM expects to submit the draft Evaluation Design to CMS by the scheduled due date of September 9, 2019. Since Demonstration approval in March, ODM has engaged with its academic partner, Government Resource Center (GRC), to develop an Evaluation Design draft that meets high academic rigor standards. Specifically, the agency's academic partner has supported development of research questions that will appropriately test the hypotheses defined in the Demonstration, as well as approaches and data sources to accurately measure those research questions. ODM's academic partner will function as the independent evaluator, which will support alignment and consistency between the Demonstration information being tested, the manner in which the information is tested, and the measurement methods for outcomes and impacts on Group VIII beneficiaries. ODM also has leveraged CMS guidance regarding the *Work and Community Engagement Evaluation Design* in its drafting to capture CMS's information and formatting expectations.

## Systems Requirements

Systems requirements broadly describe the updates needed in the state's information technology (IT) systems to support Requirement implementation. The goal of systems requirements work is to have all IT systems and system outputs (e.g., beneficiary compliance determinations, NOAs, etc.) developed and thoroughly tested by October 2020. ODM plans to complete end-to-end testing, regression testing, user acceptance testing, and quality assurance testing as part of the testing process. The October 2020 timeframe also allows for adequate training time for all entities that will use the systems.

ODM began this work in May 2019, through a series of requirements sessions, to determine process flows and necessary system updates related to functional enhancements, interfaces, and reporting. System requirements sessions involve interdepartmental staff and other resources to ensure that best practices are used for system updates. Feedback from all stakeholders who work with the Medicaid population have been and will continue to

be reviewed and taken into consideration to ensure that systems are relevant and usable in practice. System requirements validation will be completed by the end of August 2019.

System design sessions will begin October 2019 and will support design documents that will be used as a baseline for system development. Design sessions will include the cross-functional and cross-agency resources that participated in the system requirements sessions. In addition to designing the systems to support the Requirement, the sessions will develop complementary outputs such as NOAs, forms, and reports. The design sessions will continue through mid-January 2020.

## Outstanding Issues

ODM has started program design for implementation, but there are a few design features that have yet to be determined and developed. The following is a list of some of these design features, the development status of which will be reported in future Monitoring Reports<sup>1</sup>:

- Monitoring Protocol and monitoring metrics
- Policies and procedures
- Outreach and education materials
- Training materials
- Self-appraisal form
- Member notices
- Updated renewal form
- Revised application to incorporate community engagement post-eligibility requirements

## Challenges and Barriers

Successful implementation will require that ODM address potential barriers and challenges for non-exempt Group VIII members to meeting the Requirement, including: 1) availability of sufficient and reliable transportation to and from Requirement activities; 2) adequate communication to members and providers about program design, requirements, and supports; and 3) access to sufficient work and community engagement opportunities. ODM will prioritize mitigating these potential barriers for members in program design and development. ODM will monitor these and other potential barriers on an ongoing basis to proactively develop strategies for timely resolutions.

ODM also notes other potential barriers such as additional service costs needed to help Group VIII beneficiaries meet the Requirement, but which may not be eligible for federal financial participation (FFP). As noted in comments received during the public comment period, several commenters raised concerns about additional work for already stretched CDJFS caseworkers. Based on conversations with ODJFS, these concerns remain. ODM will closely monitor these and other potential barriers.

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<sup>1</sup> Note to reader: this is not intended to be an exhaustive list; rather, the list captures features more critical to implementation.

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Attachment

Work Requirement and Community Engagement Work Plan

<b>Task*</b>	<b>Completion Status</b>	<b>Start Date</b>	<b>End Date</b>
<b>Project Management</b>	In process	12/15/18	07/19/19
<i>Develop draft project communication plan and tools</i>	<i>Completed</i>	<i>01/15/19</i>	<i>02/01/19</i>
<i>Develop draft work plan and other project management tools</i>	<i>Completed</i>	<i>12/15/18</i>	<i>02/08/19</i>
<i>Submit first draft of work plan for approval</i>	<i>Completed</i>	<i>02/11/19</i>	<i>02/12/19</i>
<i>Submit work plan for review and approval</i>	<i>Completed</i>	<i>02/18/19</i>	<i>06/19/19</i>
<i>Finalize work plan and project management plan</i>	<i>Completed</i>	<i>02/28/19</i>	<i>07/19/19</i>
<b>1115 Waiver Approval</b>	<i>Completed</i>	<i>04/30/18</i>	<i>03/15/19</i>
<i>Submit waiver to CMS</i>	<i>Completed</i>	<i>04/30/18</i>	<i>04/30/18</i>
<i>CMS approves waiver</i>	<i>Completed</i>	<i>03/15/19</i>	<i>02/29/24</i>
<b>STCs</b>	<i>Completed</i>	<i>01/23/19</i>	<i>04/19/19</i>
<i>Research other states work eligibility STCs</i>	<i>Completed</i>	<i>01/23/19</i>	<i>02/19/19</i>
<i>Review ODMs STCs</i>	<i>Completed</i>	<i>02/20/19</i>	<i>03/05/19</i>
<i>Submit red-lined STCs to CMS</i>	<i>Completed</i>	<i>03/05/19</i>	<i>03/05/19</i>
<i>Negotiate STCs with CMS</i>	<i>Completed</i>	<i>03/06/19</i>	<i>03/15/19</i>
<i>Finalize STCs</i>	<i>Completed</i>	<i>03/06/19</i>	<i>03/15/19</i>
<i>Obtain final sign-off for STCs</i>	<i>Completed</i>	<i>04/15/19</i>	<i>04/19/19</i>
<i>Budget Neutrality</i>	<i>Completed</i>	<i>N/A</i>	<i>N/A</i>
<b>CMS Deliverables</b>	In process	03/01/19	02/20/20
Monitoring Protocol	Not yet implemented	04/25/19	12/12/19
Decisions on optional monitoring metrics	Not yet implemented	08/16/19	09/16/19
TA calls with CMS on Monitoring Protocol	Not yet implemented	08/16/19	09/16/19
Draft Monitoring Protocol	Not yet implemented	09/16/19	10/14/19
Review, updating and approval by ODM leadership of Monitoring Protocol	Not yet implemented	10/15/19	12/11/19
Submit Monitoring Protocol to CMS	Not yet implemented	12/12/19	12/12/19
<b>First Quarterly Monitoring Report</b>	In process	07/15/19	08/30/19
<i>Develop initial draft</i>	<i>Completed</i>	<i>07/15/19</i>	<i>07/15/19</i>
Submit updated draft for ODM review and approval	In process	07/15/19	07/26/19
Submit final report to CMS	In process	08/30/19	08/30/19
Implementation Plan	In process	04/10/19	01/27/20

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<b>Task*</b>	<b>Completion Status</b>	<b>Start Date</b>	<b>End Date</b>
<i>Develop strategy/timeframe for continuing Implementation Plan discussion</i>	<i>Completed</i>	<i>06/06/19</i>	<i>06/28/19</i>
<i>Develop Implementation Plan</i>	<i>Completed</i>	<i>04/10/19</i>	<i>07/19/19</i>
ODM review of Implementation Plan, partner review, finalize and ODM approval	In process	07/22/19	10/11/19
Submit Implementation Plan to CMS	Not yet implemented	10/11/19	10/11/19
Update Implementation Plan based on CMS feedback	Not yet implemented	11/11/19	12/13/19
Implementation Plan approved	Not yet implemented	01/06/20	01/27/20
<b>Evaluation Design</b>	<b>In process</b>	<b>03/01/19</b>	<b>02/20/20</b>
<i>Contract with independent evaluator</i>	<i>Completed</i>	<i>03/01/19</i>	<i>05/31/19</i>
<i>Mercer to draft background section of the Evaluation Design</i>	<i>Completed</i>	<i>04/25/19</i>	<i>06/07/19</i>
<i>Review of initial Evaluation Design</i>	<i>Completed</i>	<i>06/07/19</i>	<i>06/07/19</i>
ODM review of updated Evaluation Design, finalize and approve	In process	08/02/19	08/29/19
Submit Evaluation Design to CMS	Not yet implemented	09/09/19	09/09/19
Receive CMS feedback on Evaluation Design	Not yet implemented	09/27/19	10/21/19
Resubmit updated Evaluation Design to CMS	Not yet implemented	11/21/19	12/17/19
CMS reviews and approves Evaluation Design	Not yet implemented	01/06/20	01/29/20
ODM publishes the final Evaluation Design on state website	Not yet implemented	02/10/20	02/20/20
<b>Program Design</b>	<b>In process</b>	<b>01/15/19</b>	<b>09/13/19</b>
<b>Workflows</b>	<b>In process</b>	<b>01/15/19</b>	<b>09/13/19</b>
<i>Develop workflows for eligibility determination and renewal for Group VIII individuals</i>	<i>Completed</i>	<i>01/15/19</i>	<i>03/05/19</i>
<i>Conduct quality check to ensure workflows are as consistent as possible with SNAP/ABAWD workflows</i>	<i>Completed</i>	<i>04/01/19</i>	<i>04/15/19</i>
<i>Finalize first draft of workflows</i>	<i>Completed</i>	<i>04/16/19</i>	<i>04/29/19</i>
Update workflows based on system requirements and design sessions	Not yet implemented	07/17/19	11/15/19
Finalize eligibility workflows	Not yet implemented	12/12/19	12/12/19
<b>Systems</b>	<b>In process</b>	<b>07/01/18</b>	<b>02/02/21</b>



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<b>Task*</b>	<b>Completion Status</b>	<b>Start Date</b>	<b>End Date</b>
-Initiation Phase	<i>Completed</i>	07/01/18	03/20/19
-Planning Phase	<i>Completed</i>	03/25/19	07/25/19
-Analysis Phase	Not yet implemented	TBD	TBD
-Design Phase	Not yet implemented	TBD	TBD
-Development Phase	Not yet implemented	TBD	TBD
-System Testing	Not yet implemented	TBD	TBD
Ohio Benefits			
-Requirements Phase	In Progress	6/17/19	8/15/19
-Design Phase	Not yet implemented	TBD	TBD
-Development Phase	Not yet implemented	TBD	TBD
-System Testing	Not yet implemented	TBD	TBD
-User Acceptance Testing	Not yet implemented	TBD	TBD
-Go/No Go Decision	Not yet implemented	TBD	TBD
MITS	Not yet implemented	TBD	TBD
Enterprise Data Warehouse	Not yet implemented	TBD	TBD
Ohio Means Jobs	Not yet implemented	TBD	TBD
Interactive Voice Response	Not yet implemented	TBD	TBD
Policies and Procedures	Not yet implemented	06/01/20	10/30/20
Develop and finalize ODM Policies and Procedures (P&P) and other documents (as needed)	Not yet implemented	06/01/20	10/30/20
Develop and finalize other Agency P&Ps and other documents (as needed)	Not yet implemented	06/01/20	10/30/20
Ohio Administrative Code (OAC) Changes	Not yet implemented	01/01/20	12/11/20
Pre-Clearance	Not yet implemented	01/01/20	04/02/20
Draft proposed rules	Not yet implemented	02/19/20	03/10/20
Share draft rules with stakeholders and revise based on feedback	Not yet implemented	03/13/20	04/02/20
Draft additional documents for clearance process (e.g., executive summary, fiscal analysis, etc.)	Not yet implemented	03/01/20	03/23/20
Determine whether the proposed rule will be reviewed through "CSIO" or general "clearance."	Not yet implemented	03/01/20	03/23/20
Finish pre-clearance process	Not yet implemented	03/24/20	04/02/20
Clearance	Not yet implemented	04/06/20	06/05/20
Common Sense Initiative Office (CSIO)	Not yet implemented	04/01/20	09/08/20
Route rule package for internal signature	Not yet implemented	04/01/20	04/21/20

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<b>Task*</b>	<b>Completion Status</b>	<b>Start Date</b>	<b>End Date</b>
Business impact analysis	Not yet implemented	08/14/20	09/08/20
JCARR review process begins	Not yet implemented	06/15/20	06/15/20
JCARR finishes rule review process	Not yet implemented	09/11/20	09/11/20
File final rule	Not yet implemented	09/24/20	09/24/20
Route final rule package for signature	Not yet implemented	9/24/20	10/20/20
Finish OAC process	Not yet implemented	12/11/20	12/11/20
<b>Communication Plan</b>	<b>In process</b>	<b>05/31/19</b>	<b>09/13/19</b>
<i>Develop first draft of Communication Plan</i>	<i>Completed</i>	<i>05/31/19</i>	<i>07/02/19</i>
<i>Submit Communication Plan for Review by ODM</i>	<i>Completed</i>	<i>07/05/19</i>	<i>07/05/19</i>
Update Communication Plan based on Feedback	Not yet implemented	07/15/19	07/19/19
Final draft of Communication Plan completed	Not yet implemented	09/13/19	09/13/19
<b>Go-Live</b>	<b>Not yet implemented</b>	<b>11/01/20</b>	<b>04/01/21</b>
Pre-Go-Live Readiness Check	Not yet implemented	11/01/20	12/29/20
Go-Live monitoring	Not yet implemented	01/01/21	04/01/21

\*Italics and grey font notes completed tasks.