

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard, Mail Stop S2-26-06  
Baltimore, Maryland 21244-1850



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## State Demonstrations Group

February 19, 2019

Cindy Gillespie  
Director  
Arkansas Department of Human Services  
700 Main Street  
Little Rock, Arkansas 72201

Dear Ms. Gillespie:

The State of Arkansas submitted its revised community engagement eligibility and enrollment monitoring plan as required by special term and condition (STC) 54 of the state's section 1115 demonstration, Arkansas Works (Project No. 11-W-00287/6). The Centers for Medicare & Medicaid Services (CMS) has reviewed the monitoring plan and determined that it is consistent with the requirements outlined in the STCs; therefore, with this letter, CMS is approving the monitoring plan for completeness and the state may continue implementation of its community engagement program under the terms of its demonstration.

The revised monitoring plan has been incorporated in the STCs as Attachment A; we have included a copy of the revised STCs with the updated Attachment A. As outlined in STC 54, the state will provide status updates on the implementation of the eligibility and enrollment monitoring plan as part of the state's quarterly and annual monitoring reports. Should the state wish to make additional changes to the monitoring plan, the state should submit revisions to the plan for CMS review and approval.

If you have any questions, please contact your project officer, Ms. Rachel Nichols, at 410-786-6269 or by email at [Rachel.Nichols@cms.hhs.gov](mailto:Rachel.Nichols@cms.hhs.gov). We appreciate your cooperation throughout the review process.

Sincerely,

/s/

Andrea J. Casart  
Director  
Division of Medicaid Expansion Demonstrations

Enclosure

cc: Bill Brooks, Associate Regional Administrator, CMS Dallas Regional Office

## ATTACHMENT A

### Eligibility and Enrollment Monitoring Plan

#### Arkansas Works – Work and Community Engagement Amendment

##### Strategic Approach

###### **Overview**

Arkansas plans to test innovative and administratively efficient approaches to promoting personal responsibility, encouraging improved health and well-being and movement up the economic ladder by requiring work and community engagement as a condition of continued eligibility in the Arkansas Works program. Based on enrollment as of March 2, 2018, approximately 69,000 out of 278,734 individuals currently enrolled in Arkansas Works will be expected to participate in monthly approved work activities. Arkansas has designed the work and community engagement requirement for Arkansas works to closely align with requirements in the Supplemental Nutrition Assistance Program (SNAP). SNAP work requirements can be reviewed in online policy through the following link:

<https://ardhs.sharepointsite.net/DHSPolicy/Pages/dcohome.aspx>.

Once work requirements are fully implemented, Arkansas Works beneficiaries who are ages 19-49 must work or engage in specified educational, job training, job search or community service activities for at least 80 hours per month to remain covered through Arkansas Works, unless they meet exemption criteria established by the state. Arkansas Works beneficiaries who are subject to work requirements will be required to demonstrate that they are meeting the work requirements on a monthly basis. Arkansas Works beneficiaries who fail to meet the work requirements for any three months during a plan year will be dis-enrolled from Arkansas Works and will not be permitted to re-enroll until the following plan year.

###### **External Partnering for Success**

Arkansas plans to build on the innovation of the premium assistance model by partnering with insurance carriers who provide qualified health plans for Arkansas Works beneficiaries. The carriers will leverage their current care coordination and outreach activities to encourage work and assist Arkansas Works beneficiaries to engage in activities that satisfy the work and community engagement requirement as one of the steps to promoting overall healthy living. The relationship between DHS and carriers is outlined in a Memorandum of Understanding.

The Arkansas Department of Human Services (DHS) has had a long-standing partnership with the Arkansas Department of Workforce Services (DWS). Together, we have jointly administered the Temporary Assistance for Needy Families (TANF) program in Arkansas for more than a decade. Act 1705 of the 85<sup>th</sup> Arkansas General Assembly transferred the TANF block grant from DHS to DWS. Responsibilities of each agency in the operation of the program are documented through a Memorandum of Understanding that is updated annually. As part of the agreement, Arkansas DHS provides eligibility and enrollment services for the Transitional Employment Assistance (TEA) program

while Arkansas DWS provides case management services to help move beneficiaries toward self-sufficiency. Arkansas DHS staff conducts eligibility interviews, explain program requirements, and authorize TEA coverage in the DHS legacy system called ANSWER. The ANSWER system automatically creates an electronic referral to Arkansas DWS staff that also has access to the ANSWER eligibility system. Arkansas DWS staff communicates with Arkansas DHS staff when changes in eligibility are needed. Act 1 of the 90<sup>th</sup> Arkansas General Assembly Second Extraordinary Session required Arkansas DHS to refer all Arkansas Works beneficiaries with income at or below 50% of the federal poverty level to Arkansas DWS for free job search and job training assistance. In compliance with this law, we expanded that partnership in January 2017 to include a referral to obtain job search assistance and training opportunities available at the Arkansas DWS for all Arkansas Works beneficiaries. Arkansas DWS has physical locations in thirty-two out of seventy-five counties and statewide services available online by accessing the following link: [www.arjoblink.arkansas.gov](http://www.arjoblink.arkansas.gov) or [www.dws.arkansas.gov](http://www.dws.arkansas.gov). Arkansas DHS and DWS exceeded the requirement of the law by referring all recipients approved or renewed in the Arkansas Works program each month to DWS. The referral language was added to the approval and renewal notices. To track and monitor the effectiveness of the referral process, Arkansas DHS and DWS began exchanging monthly files to identify those who were referred that actually accessed services at DWS. In addition to identifying those who accessed DWS services, we also identified whether or not they were reported by employers to DWS as newly hired individuals. We obtained data through this process that demonstrates that Arkansas Works beneficiaries who had accessed services at Arkansas DWS were more likely to find work. Over the last 12 months, 347,949 Arkansas Works enrollees have received a referral to DWS. Of that number, 16,900 have accessed services at DWS. Additionally, 27% of those who accessed services at DWS have been reported by employers as new hires compared to 12% of those who did not access services at DWS. See Attachment 1 for the most recent rolling 12 month Arkansas Works – DWS referral report. We will further expand this partnership to serve Arkansas Works beneficiaries with a work or community engagement requirement. Arkansas DHS will continue to provide referrals and information about services available through the Arkansas DWS in all of our notices related to the Arkansas Works program. Attachment 2 is a sample Arkansas Works notice that contains the DWS referral language that is included in all Arkansas Works notices. Arkansas DWS will also send follow-up letters to Arkansas Works beneficiaries who have a work and community engagement requirement. A sample copy of the DWS follow up letter that is sent to Arkansas Works beneficiaries with work and community engagement requirements will be provided once finalized. Arkansas DWS will provide career assessment, job-search assistance, and referrals for training as appropriate. The Workforce Opportunities and Innovation Act of 2014 (WIOA) placed heightened emphasis on coordination and collaboration at the Federal, State, local, and tribal levels to ensure a streamlined and coordinated service delivery system for job seekers, (from low income families including those with disabilities), and employers.

Job seekers can also explore training programs offered through the extensive Eligible Training Provider List. They can discuss education, training, and apprenticeship programs through Arkansas DWS-WIOA, their partners, and determine if they would qualify to participate in any of those opportunities. Since Arkansas Works participants are considered low income, they could be eligible for those services

(Funding and slots availability, and additional requirements may apply). Arkansas Works recipients will also have access to attain Career Readiness Certifications (CRCs), create professional resumes, and other universal job services to help be effective in their job-search activities. The following screenings and assessments available in the Arkansas Workforce Integrated Network System (ARWINS) for Arkansas Works recipients:

- A basic screener to determine if the client could be eligible for UI, targeted WIOA programs, computer literacy
- Assessments that will help determine job-seeker Characteristics like Abilities, Occupational Interests, Work Values, Skills, Knowledge, and high demand occupation matches based on current education and experience levels
- Assessments that will help determine if the job-seeker has any barriers as related to Transportation, Child Care, Legal, Domestic Violence, and Homelessness

The assessments are voluntary and there is a prescribed path. The job-seeker is encouraged to take the path, but the individual will not be forced to take those assessments.

Arkansas DHS has also leveraged our current contract for Medicaid beneficiary relations with the Arkansas Foundation for Medical Care (AFMC) to provide outreach and education about the work and community engagement requirement. AFMC will do active outreach to educate Arkansas Works beneficiaries who need to complete work and community engagement activities to make sure they understand the requirements. AFMC will also provide education and assistance to beneficiaries on how to properly and timely report their activities and to direct them to the Arkansas Department of Workforce Services, Supplemental Nutrition Assistance Program (SNAP) Employment and Training providers, or other resources as appropriate to help them comply with work requirements. Contractual requirements for work and community engagement include an outreach period 30 days prior to the beginning of work and community engagement requirements for existing Arkansas Works beneficiaries. Outreach and education methods will include outbound phone contact as well as an inbound integrated voice response system where beneficiaries can receive education about work and community engagement requirements. All scripts and materials used by AFMC will be approved by DHS. AFMC will also spend the first 12 days conducting outreach and education after an Arkansas Works beneficiary is approved with work and community engagement requirements. AFMC must successfully contact and educate 30% of existing Arkansas Works beneficiaries and 40% of newly approved Arkansas Works beneficiaries. To facilitate the successful outreach and education, AFMC staff has received training and access to our Curam eligibility system and will be receiving a daily and monthly file containing Arkansas Works beneficiaries with work and community engagement requirements and their current status related to these activities. AFMC is required to make a minimum of two attempts by a live agent to contact beneficiaries by phone when a phone number is available. Additional attempts and methods used by AFMC to reach their contractual obligations are not specified. AFMC will be required to provide DHS with results of outreach efforts through various reports.

Arkansas implemented the requirement to work in the Supplemental Nutrition Assistance Program (SNAP) statewide in January 2016. The Arkansas Department of Human Services has partnered with the United States Department of Agriculture Food and Nutrition Services since that time to expand the SNAP Employment and Training Program in Arkansas. Participation in SNAP Employment and Training is one option available to SNAP recipients as a means to comply with SNAP work requirements. SNAP recipients may also comply on their own through work, education, training, or community service and volunteerism activities. Arkansas has expanded the availability of SNAP Employment and Training from thirteen to fifty out of seventy-five counties since January 2016. In each of these counties DHS has either a contract or sub grant agreement in place with at least one SNAP Employment and Training provider with a physical location to provide employment and training services. DHS is currently in negotiations with additional providers to add an additional fifteen counties by the end of 2018. DHS has commitments from the providers who will cover these additional counties and we are awaiting approval from the USDA Food and Nutrition Services to implement this additional expansion. Point in time data comparison in March 2018 between the SNAP program and Arkansas Works has shown that approximately twenty-two to twenty-five percent of Arkansas Works beneficiaries also receive SNAP. We plan to leverage the expanded SNAP Employment and Training program to assist individuals who are dually eligible for SNAP and Arkansas Works to meet work and community engagement requirements by referring them to SNAP Employment and Training providers as appropriate for assistance with job search and training. SNAP Employment and Training providers already attempt to reach and engage SNAP recipients. SNAP recipients who are also enrolled in Arkansas Works may satisfy work and community engagement requirements in both programs by participating in SNAP Employment and Training. A list of our current SNAP Employment and Training providers is provided as Attachment 3. A map showing the current SNAP E & T coverage is provided as Attachment 4. Proposed expanded SNAP E & T coverage by the end of 2018 is provided as Attachment 5. Dual SNAP and Arkansas Works beneficiaries will be allowed to satisfy the work and community engagement requirement for both programs by participating in and reporting in either the SNAP or the Arkansas Works program. They will not be required to comply with or report separately to both programs to maintain continued eligibility. The Arkansas Works program, SNAP, and the Transitional Employment Assistance programs reside in separate eligibility systems operated by Arkansas DHS. Working with contracted developers for both systems, Arkansas DHS has developed a process whereby data files will be exchanged between these systems daily to update exemption and compliance information in both programs without manual intervention by the beneficiaries or DHS staff. User acceptance testing to validate this process is underway.

### **Online Reporting**

Arkansas has enhanced the innovation and administrative efficiency of the work and community engagement requirement by planning and designing an online portal for beneficiaries to report their work activities, exemptions, and other household changes. This portal is actually an enhancement of the Curam eligibility system that has already passed CMS readiness review standards. DHS required through contract with Curam developers that the portal is mobile device friendly and ADA compliant. The [access.arkansas.gov](http://access.arkansas.gov) online portal complies with 42 CFR 435.1200 f (2). Beneficiaries will use an email address and password to access the online portal. Rather than providing verification of exempt or

compliant status with paper documentation, beneficiaries will enter and attest to the information submitted through the online portal. These attestations will be evaluated through a robust quality assurance process (See Quality Assurance and Fraud Process). Use of the portal promotes work and community engagement goals by reinforcing basic computer skills, internet navigation, and communication via email. This approach is administratively efficient to implement. The eligibility system processes information submitted via the online portal automatically without worker intervention. This allows Arkansas to implement the work and community engagement requirement without additional resources. Individuals, who are disabled, including mental and physical disability, will be exempt from work and community engagement requirements and will not be at risk for losing coverage. Arkansas DHS will provide reasonable accommodations to assist individuals with the online reporting requirement. Beneficiaries may receive in-person assistance through the local DHS county offices. All notices provide instructions to contact the Access Arkansas Call Center or a county office for help regarding work and community engagement requirements.

Arkansas DHS has also developed a “Registered Reporter” process to assist individuals with their online reporting requirements. Individuals may become a registered reporter by reviewing specified online training material, signing a Registered Reporter Acknowledgement Form and emailing that form to Arkansas DHS. The beneficiary must also authorize the reporter to serve in that role. To promote this as an additional reporting support for Arkansas Works beneficiaries, Arkansas DHS will announce this process through a press release and schedule meetings and webinars with stakeholder agencies. Information on the process and training is available on our public SharePoint site at the following link: <https://ardhs.sharepointsite.net/ARWorks/default.aspx>.

**Operational update:** In December 2018, Arkansas DHS launched an Arkansas Works Helpline to further assist individuals with their online reporting requirements. As of December 19, 2018, individuals may contact our county offices or call our toll-free number 855-372-1084 to report directly to Arkansas DHS by phone. Beneficiaries may now report the types and hours of work and community engagement activities that they participate in, report changes in exemption status, and renew existing exemptions by phone directly to DHS staff who will key the information into the system. This is in addition to receiving in-person assistance in the DHS county offices, from registered reporters, or through self-service using the online portal.

### **Outcome Monitoring**

Arkansas DHS will develop reports that track the following information related to the Arkansas Works program:

- Number and percentage of individuals required to report each month
- Number and percentage of beneficiaries who are exempt from the community engagement requirement
- Number and percentage of beneficiaries requesting good cause exemptions from reporting requirements

- Number and percentage of beneficiaries granted good cause exemption from reporting requirements
- Number and percentage of beneficiaries who requested reasonable accommodations
- Number and percentage and type of reasonable accommodations provided to beneficiaries
- Number and percentage of beneficiaries disenrolled for failing to comply with community engagement requirements
- Number and percentage of beneficiaries disenrolled for failing to report
- Number and percentage of beneficiaries disenrolled for not meeting community engagement and reporting requirements
- Number and percentage of community engagement appeal requests from beneficiaries
- Number, percentage and type of community engagement good cause exemptions requested
- Number, percentage and type of community engagement good cause exemptions granted
- Number, percentage and type of reporting good cause exemptions requested
- Number, percentage and type of reporting good cause exemptions granted
- Number of appeals of dis-enrollments for non-compliance with community engagement
- Number of appeals for dis-enrollments for failure to comply with the reporting requirements
- Number and percentage of applications made in-person, via phone, via mail and electronically.

All of the data required to produce these reports is owned by Arkansas DHS, with the exception of the good cause exemption reports and the work and community engagement appeal requests; these reports will be system-generated from the eligibility system data warehouse. Requirements, design, and delivery of these reports are covered by the Arkansas DHS contractual agreement with the eligibility system developer. A database outside of the eligibility system is being developed by DHS to track and report all good cause exemption metrics. Appeal metrics will be tracked and provided by the DHS Office of Chief Counsel Appeals and Hearings section. These reports will be compiled monthly and will be reported to CMS quarterly. Documentation on design requirements for each report will be available at a later date when report development is complete.

### **Implementation Plan and Timeline**

Planning, policy and system development, partner and stakeholder engagement, and resource availability assessment (See Community Resource and Supports Availability Mapping) began in January 2017 and have been ongoing.

Upon approval of the work and community engagement amendment, Arkansas began finalizing plans and testing of the process to implement the requirement on June 1, 2018. Based on data as of March 2, 2018, there were 171,449 Arkansas Works beneficiaries ages 19 – 49. Approximately 69,000 have no initial exemption identified through system data. Due to the number of beneficiaries impacted, Arkansas will phase in work requirements by age group. Beginning June through September 2018, beneficiaries ages 30 – 49 at or below federal poverty level will be phased in to the work requirement. 19 – 29 year olds at or below federal poverty level will be phased in during 2019 between January and April.

**Operational update:** The phase in plan for 2019 was adjusted to include implementing beneficiaries ages 30 – 49 in households with income above 100% FPL as well as all beneficiaries ages 19 – 29.

Additionally, beneficiaries ages 19 – 29 will be phased in over six months between January and June 2019 rather than four months.

Based on the same data, there were 125,242 Arkansas Works beneficiaries ages 30 – 49. Of those, 38,321 have no exemption identified through system data. Arkansas has chosen to phase in this group over four months based on when their cases are due for renewal. The chart below depicts the month the work requirement begins, the renewal months and number of beneficiaries affected.

<b>Month Work Requirement Begins</b>	<b>Renewal Months</b>	<b>Approximate #of beneficiaries required to report work activities</b>
June 2018	Jan, Feb, Mar	9,152
July 2018	April, May, June	9,341
August 2018	July, August, September	8,682
September 2018	Oct, Nov, Dec	11,146
<i>Data date: 3/2/2018</i>	TOTAL	38,321

The planning, testing, implementation, and monitoring timeline is provided below:

- **March 15, 2018** – Mass notice will be issued to all Arkansas Works beneficiaries informing them of the change in the program and upcoming implementation of work and community engagement requirements. The notice will instruct them that no additional action is required at that time and will encourage them to provide an email address to Arkansas DHS if they have not already.
- **March 30, 2018** – The Arkansas Works online portal will go live. Beneficiaries will be able to begin linking their secure online accounts and reporting exemptions.
- **April 1, 2018** – New Arkansas Works beneficiaries ages 30 – 49 approved beginning April 1, 2018, or later will become subject to the work and community engagement and have their begin dates for completing and reporting work activities set to begin the second month after approval.
- **April 1 – 8, 2018** – Work requirement begin months will be set for beneficiaries 30 – 49 years of age and notices will be mailed to each individual with specific details about the work and community engagement requirement, services available through Arkansas DWS, and instructions on how to access and log in to the online portal.
- **April 13, 2018** – The first data file of Arkansas Works beneficiaries containing specific information regarding work and community engagement details will be provided to Arkansas DWS, the Medicaid Beneficiary Relations provider, and QHP carriers. Outreach and education will begin. Updated files will be provided weekly thereafter.
- **May 8, 2018** – Arkansas Works beneficiaries ages 30 – 49 who are scheduled to begin the work and community engagement requirement in June 2018 will be mailed individually tailored notices. The notice will contain information regarding any exemption and the type of exemption that has been identified through data in systems. Those who are exempt will be instructed that no additional action is necessary unless their circumstances change and that they will be notified when they are expected to take further action. Those without an identified exemption will receive a notice that instructs them that they will be required to begin completing and reporting work activities during the month of June 2018. The notice will contain full details about the work requirement, how and where to report a previously unidentified exemption and / or completion of work activities. The notice will inform them of the consequence of non-compliance.



- **June 1, 2018** – Implementation of mandatory work requirements begins for individuals ages 30 - 49.
- **June 8, 2018** - Arkansas Works beneficiaries ages 30 – 49 who are scheduled to begin the work and community engagement requirement in July 2018 will be mailed individually tailored notices.
- **June 26, 2018** – The Post Award Forum will be held at 10:00 AM at the Hillary Rodham Clinton Children’s Library and Learning Center, 4800 W. 10<sup>th</sup> Street, Little Rock, AR 72204.
- **July 8, 2018** - Arkansas Works beneficiaries ages 30 – 49 who are scheduled to begin the work and community engagement requirement in August will be mailed individually tailored notices.
- **August 8, 2018** - Arkansas Works beneficiaries ages 30 - 49 who are scheduled to begin the work and community engagement requirement in September 2018 will be mailed individually tailored notices.
- **August 30, 2018** – Monitoring phase begins and first quarterly report will be posted to the Arkansas DHS website.
- **November 1, 2018** - New Arkansas Works beneficiaries ages 19 - 29 approved beginning November 1, 2018, or later will become subject to the work and community engagement and have their begin dates for completing and reporting work activities set to begin the second month after approval.
- **November 1 – 8, 2018** - Work requirement phase in will be set based on renewal months for beneficiaries 19 - 29 years of age and notices will be mailed to each individual with specific details about the work and community engagement requirement, services available through Arkansas DWS, and instructions on how to access and log in to the online portal.
- **November 30, 2018** – Second quarterly monitoring report will be submitted to CMS.
- **December 8, 2018** - Arkansas Works beneficiaries ages 19 – 29 and beneficiaries ages 30 – 49 with household income above 100% FPL who are scheduled to begin the work and community engagement requirement in January 2019 will be mailed individually tailored notices. The notice will contain information regarding any exemption and the type of exemption that has been identified through data in systems. Those who are exempt will be instructed that no additional action is necessary unless their circumstances change and that they will be notified when they are expected to take further action. Those without an identified exemption will receive a notice that instructs them that they will be required to begin completing and reporting work activities during the month of January 2019. The notice will contain full details about the work requirement, how and where to report a previously unidentified exemption and / or completion of work activities. The notice will inform them of the consequence of non-compliance.
- **January 1, 2019** – Implementation of mandatory work requirements begins for individuals ages 19 – 29 and individuals ages 30 – 49 with household income above 100% FPL.
- **January 8, 2019** - Arkansas Works beneficiaries ages 19 - 29 who are scheduled to begin the work and community engagement requirement in February 2019 will be mailed individually tailored notices.
- **February 8, 2019** - Arkansas Works beneficiaries ages 19 - 29 who are scheduled to begin the work and community engagement requirement in March 2019 will be mailed individually tailored notices.
- **February 28, 2019** – Third quarterly monitoring report will be submitted to CMS.
- **March 8, 2019** - Arkansas Works beneficiaries ages 19 - 29 who are scheduled to begin the work and community engagement requirement in April 2019 will be mailed individually tailored notices.

- **April 8, 2019** - Arkansas Works beneficiaries ages 19 - 29 who are scheduled to begin the work and community engagement requirement in May 2019 will be mailed individually tailored notices.
- **April 30, 2019** – Fourth quarterly monitoring report will be submitted to CMS.
- **May 8, 2019** – The final group of Arkansas Works beneficiaries ages 19 - 29 who are scheduled to begin the work and community engagement requirement in June 2019 will be mailed individually tailored notices.

### **Arkansas Works Application and Renewal Overview**

Applications for healthcare coverage are accepted through multi-channels including online, by phone, in person, and by mail. Application assistance is provided by Arkansas DHS staff both in person and by phone. No changes are needed to the current process for applications related to the addition of the work and community engagement requirement. Assistance is provided in local offices to those who need assistance completing applications. Arkansas DHS also maintains a contract with a vendor who provides interpretation and translation services. This service is accessible statewide and each county office can access the vendor as needed to assist individuals. Arkansas DHS also accepts applications from incarcerated individuals up to forty-five days prior to release. The Arkansas Department of Corrections has contracted with a vendor to assist exiting inmates with the application process for Medicaid prior to release. Applications received from beneficiaries who lost eligibility due to non-compliance with work and community engagement requirements will be denied if received prior to the yearly open enrollment period. Applications received during open enrollment will be processed with coverage beginning on January 1 of the following year for beneficiaries that are otherwise eligible. The State’s reasonable accommodation process will be available in a procedural desk guide developed for Medicaid eligibility caseworkers and administrative staff and will be posted online once complete.

Renewals are conducted monthly through an ex-parte process. Beneficiaries whose renewals cannot be completed ex-parte are sent specific notices to provide information that is needed to complete the renewal. Beneficiaries are not required to complete forms that require information that has been previously provided or is available to DHS. Arkansas Works beneficiaries who are subject to work and community engagement requirements will have their renewals completed by the same method as beneficiaries who are not subject to work and community engagement activities. Work activity reporting continues through the online portal with no interruption or change to the reporting process during renewal. Being non-compliant in the month a beneficiary’s case is due for renewal does not prevent the ex-parte renewal process from occurring.

Arkansas monitors Medicaid timeliness with data and conducts a weekly Medicaid Eligibility Operations meeting to review progress and develop strategies to address any issues that arise. Weekly management reports are reviewed by the team during each meeting. Timeliness reports can be provided along with other quarterly reports. Additional information is also reported to CMS monthly through Performance Indicators.

Arkansas DHS completes daily electronic account transfers to the federally facilitated marketplace for individuals determined to be ineligible for Medicaid. No changes to this process are necessitated by the addition of the work and community engagement process.

### **Work and Community Engagement Overview and Operational Approach**

### **Population Subject to Work Requirements**

Once work requirements are implemented in June of 2018, on a rolling, phased in basis, Arkansas Works beneficiaries ages 19 to 49 who do not meet established exemption criteria will be required to meet work requirements as a condition of continued Arkansas Works eligibility. Work requirements will not apply to Arkansas Works beneficiaries ages 50 and older. Work and Community Engagement Requirements will be promulgated according to the State's Administrative Procedures Act in Medicaid eligibility rules. Link to the promulgated Medicaid eligibility manual: <https://ardhs.sharepointsite.net/DHSPolicy/Pages/dcohome.aspx>.

### **Exemption from Work Requirements**

Arkansas Works beneficiaries meeting one of the criteria described in the STCs will be exempt from work requirements. Exemptions will be identified through a beneficiary's initial application for coverage, an electronic submission demonstrating the exemption, or a change in circumstances submission. When a beneficiary's exemption expires, he or she will be required to demonstrate that the exemption is still valid and continues. Information provided during the application process and data obtained systematically will be used to identify several types of exemptions including employment and self-employment of at least 80 hours a month, medical frailty, exemption from the SNAP work requirement, receipt of TEA Cash Assistance, and receipt of unemployment benefits. Beneficiaries for whom an exemption is not established during the application process will have an opportunity to attest to an exemption upon approval. Detailed information about exemptions from work and community engagement requirements can be found online at the following link. Link: <https://ardhs.sharepointsite.net/DHSPolicy/Pages/dcohome.aspx>

### **Allowed Work Activities and Work Activity Hour Calculations**

Arkansas Works beneficiaries ages 19 – 49 who are not exempt must engage in 80 hours of monthly work and community engagement activities. Arkansas Works beneficiaries can meet the work requirements by either meeting SNAP work requirements or by completing at least 80 hours per month of some combination of activities as deemed appropriate by the state. Arkansas Works beneficiaries must demonstrate electronically on a monthly basis that they are meeting the work requirement. Detailed information about allowed work and community engagement activities can be found online at the following link. Link: <https://ardhs.sharepointsite.net/DHSPolicy/Pages/dcohome.aspx>

### **Disenrollment for Failure to Meet Work Requirement**

Beneficiaries who are subject to work requirements will lose eligibility for Arkansas Works if they fail to meet work requirements for any three consecutive or non-consecutive months during the coverage year. Effective the end of the third month of noncompliance, such beneficiaries who fail to meet the work requirements will be terminated from coverage, following proper notice and due process, and subject to a lockout of coverage until the beginning of the next coverage year, at which point they will be permitted to re-enroll in Arkansas Works. Arkansas Works beneficiaries whose coverage has been terminated due to non-compliance may apply for and receive coverage in other Medicaid categories if eligible during the lockout period. Notices of denial and closure due to non-compliance with work and community engagement requirements will contain information about how to access primary and

preventive care services at low or no cost at free health clinics and community health centers (See Community Resource and Supports Mapping). Closure of the Arkansas Works case will be transmitted to the InterChange Medicaid Management Information System. Termination of the QHP premium payment is automated in the InterChange system.

### **Beneficiary Work and Community Engagement Online Reporting Requirements**

Beneficiaries must use the online portal to report exemptions and completion of work and community engagement activities. The work and community engagement portal is part of the existing eligibility system. Information entered into the portal is seamlessly processed by the eligibility system with no additional beneficiary or DHS staff requirement to re-key or transfer the information into the system. Exemptions must only be re-attested to at the required intervals specified above. Completion of work activities must be entered and attested to monthly. Individuals will have until the 5<sup>th</sup> day of the following month to attest for the previous month. The online portal is secure, mobile device friendly, and compliant with the ADA. The portal requires an email address and password to access. To assist beneficiaries prepare for this requirement, Arkansas DHS and our Access Arkansas Call Center have conducted a campaign over the last several months where we encourage beneficiaries to provide an email address. We have also offered information about how to obtain free email addresses and assistance with setting up email addresses. We have been able to collect several thousand email addresses during this effort. The portal allows beneficiaries to reset passwords through self-service. Technical assistance will also be available through our Access Arkansas Call Center for website and password issues. Beneficiaries who require assistance using the portal can receive assistance from several sources, including Arkansas DHS staff, Call Center Agents, Arkansas DWS staff, or their QHP carrier. Arkansas DHS worked with the University of Arkansas for Medical Sciences Health Literacy team to help develop language for work and community engagement notices and fliers. Similar verbiage was used on the portal for consistency and understanding at lower literacy levels. Arkansas DHS maintains a contract for language interpretation and translation. Beneficiaries who need assistance with languages other than English will be assisted in the local DHS county offices. Each notice and flier regarding work and community engagement direct beneficiaries who need help to contact our toll-free call center or local DHS County office. The portal will be available daily between 7 AM and 9 PM except for times when it is necessary to take the portal offline for system upgrades. Those outages when necessary are scheduled over weekends for minimal disruption. The website displays a notice each time the portal is offline for maintenance. The State will make every effort not to schedule maintenance during the first through the fifth of each month for beneficiaries who need to report the previous month's activities before the reporting deadline.

Upon logging into the portal, beneficiaries will be able to see their work and community engagement status for the current reporting month as well as history for the year to date. They will be able to update and confirm their contact information and household composition. Beneficiaries will know immediately upon submission if they have entered enough information to be considered compliant or exempt for the reporting month. If they have not yet completed 80 hours, the portal will display the

number of hours needed to become compliant. Each portal screen includes information about the method for calculating completed hours for that activity.

### **Good Cause Exemptions / Catastrophic Events**

Beneficiaries who have experienced a catastrophic event during a month they were required to complete work activities will be exempt from work requirements or reporting by requesting and being granted a good cause exemption. Circumstances that may lead to an approved good cause exemption are outline in the STCs and include but are not limited to a natural disaster, hospitalization or serious illness, birth or death of a family member living in the home and domestic violence. Beneficiaries who have lost coverage due to non-compliance with the work and community engagement requirement will have their cases reinstated without a new application if they are granted a good cause exemption and are otherwise eligible. Information about good cause exemptions and how to request these is provided in all work and community engagement notices. Verification of the catastrophic event which caused the beneficiary not to complete and/or report required activities will be required as part of the good cause approval process. DHS staff may use discretion to waive the verification in cases such as natural disaster when the event is known to the general public.

### **Interim Period Prior to Work and Community Engagement Requirement – Outreach and Education**

Newly approved Arkansas Works beneficiaries who are subject to the work and community engagement requirement will have an interim period of up to 59 days prior to beginning work activities. The work requirement will begin on the first of the second month after the month of approval. For example, a non-exempt beneficiary approved in the Arkansas Works program on any day during the month of April will be required to begin completing work activities on June 1<sup>st</sup>. Through our implementation plan, existing beneficiaries will also have an interim period after notification before they are required to begin completing and reporting work activities. The interim period will be used to conduct outreach to beneficiaries to educate them on all aspects of the work requirement including using the online portal, connecting with the Arkansas Department of Workforce Services and other resources to assist them with compliance with work activities. The outreach will be done through a multi-media and multi-partner approach that includes Arkansas DHS, Arkansas DWS, our Medicaid Beneficiary Relations provider, and QHP carriers. This outreach effort also involves social media including Facebook and Twitter. Over the last several months, Arkansas DHS has developed several educational tools regarding work and community engagement requirements that are intended to assist beneficiaries and partners alike. These tools include a computer-based training on the Arkansas Works program and the work and community engagement requirement. Tutorials on linking their secure account on the portal, entering work activity and exemption information on the portal have also been developed. This Arkansas Works toolkit will be available online to the public so that partners and beneficiaries can access the information as needed. Link to Arkansas Works education and Outreach information:

<https://ardhs.sharepointsite.net/ARWorks/default.aspx>.

### **Operational Update: Enhanced Outreach and Education**

In our ongoing efforts to monitor this program and adjust our operational approach to help beneficiaries successfully engage in the work and community engagement requirement, Arkansas DHS launched and Arkansas Works Helpline to assist individuals with their online reporting requirement by phone directly to DHS through our toll-free phone number in December 2018. Beneficiaries may now report the types and hours of work and community engagement activities that they participate in, report changes in exemption status, and renew existing exemptions by phone directly to DHS staff who will key the information into the system. In addition to helping inbound callers, this team is also conducting proactive outreach to beneficiaries identified through various monitoring reports to offer them additional assistance. This team makes proactive calls to beneficiaries who have reported some activities, but not enough to meet the 80-hour requirement as well as beneficiaries who have exemptions that ended and have not been renewed. This team provides education to connect beneficiaries with additional options for meeting the requirement and uses the Resource Dashboard to help guide the discussion.

### **Work and Community Engagement Notices**

In addition to traditional postal mail, Arkansas DHS will communicate with Arkansas Works beneficiaries who have provided email addresses through an electronic message to a secure inbox. Notices content will meet all requirements in the standards, terms, and conditions reflected in the approved 1115 waiver amendment. With the exception of good cause exemption denials, all notices related to the work and community engagement requirement are automated and system-generated in real time. This automation ensures that timely and adequate notice requirements are met. Specific notices related to work and community engagement requirements have been developed and contain detailed information for beneficiaries.

Until good cause exemption functionality can be developed in our eligibility system, notices of either approval or denial of a good cause exemption will be manually generated and uploaded to the electronic case record. A separate tracking website will be developed and maintained for Arkansas DHS staff to use to track good cause exemption requests for noncompliance with work activities or reporting requirements until this capability is achieved in the eligibility system to meet CMS monitoring and reporting requirements included in the approved waiver amendment.

### **Community Resource and Supports Availability and Mapping**

Arkansas DHS has been working with a team of partners and stakeholders for several months to identify community engagement resources throughout the state. This team includes Arkansas DHS, Arkansas DWS, Arkansas Center for Health Improvement, representatives from each Arkansas Works qualified health plan carrier, the Arkansas Hospital Association, the University of Arkansas for Medical Sciences, and the Arkansas Department of Career Education. Input and participation is open to interested stakeholder organizations. As a result of this effort, an Arkansas Works Interactive Resource Map has been developed for users to click county by county for specific information on local resource availability. The resource map contains information on work and employment services, education and training opportunities, and volunteerism opportunities. The resource map also contains information on

locations with public access to computers and free Wi-Fi and other supportive resources such as public transportation, substance abuse treatment, housing, and more. Public access to computers is being provided by Arkansas DHS, Arkansas DWS, Arkansas libraries and other community organizations. We are also actively engaging other state agencies and non-profit agencies to assess their willingness and capacity to provide support to Arkansas Works beneficiaries in this and other ways. Arkansas DHS has lead on this project. Locations where beneficiaries and former beneficiaries can access free and reduced cost health care have also been collected and made available in this map. DHS will include information in notices for individuals who lose coverage due to non-compliance in addition to sharing this information through social media. This resource map will be available to the public online in the Arkansas Works information SharePoint site and will be updated quarterly and as new information becomes available. Link to Arkansas Works Information: <https://ardhs.sharepointsite.net/ARWorks/default.aspx>

### **Quality Assurance and Fraud Process**

Arkansas DHS will conduct a monthly quality assurance process to validate exemptions and work activities that have been attested to by beneficiaries as a special effort in addition to normal PERM and MEQC requirements. The quality assurance process will include reviewing a statistically valid random sample to achieve a 95% (+ / - 3% variance) level of confidence. In addition to these quality assurance reviews, Arkansas DHS will review data on attestations monthly and quarterly from the universe of Arkansas Works beneficiaries who are subject to work and community engagement requirements to identify trends and potential anomalies that should also be reviewed for accuracy. Based on the outcomes of these reviews, the quality assurance process will be enhanced with additional reviews in error prone areas. The quality assurance component will be promulgated in Medicaid eligibility rules. Specific quality assurance processes will be outlined in a procedural desk guide for DHS staff. If inaccuracies are discovered during the quality assurance process, appropriate action will be taken to remove months of exemption or compliance. If this results in three months of non-compliance for the calendar year, the Arkansas Works case will be closed and referred for investigation as potential fraud and overpayment.

### **Appeal Process**

Beneficiaries will be provided full appeal rights with regard to work and community engagement requirements just as they have for other Medicaid eligibility determinations. The process will be the same regardless for the reason for appeal. Each notice contains information about beneficiaries' rights to appeal and how to request an appeal. Requests for appeal that are received in county offices are forwarded to the DHS Office of Chief Counsel Appeals and Hearings Unit who schedule and conduct appeal hearings and render decisions.

### **Data Exchange between Programs and Partners**

To ensure that dual Arkansas Works and SNAP beneficiaries have no additional compliance or reporting requirements, Arkansas DHS will use data exchanges between systems to record compliance and exemption information. This data exchange is currently in the final stages of testing. SNAP and Arkansas Works beneficiaries may choose to comply through either program.

To ensure a robust outreach and education process, a weekly data file will be shared with Arkansas DWS, our Medicaid Beneficiary Relations provider, and each QHP carrier. Information provided to carriers will be limited to Arkansas Works beneficiaries that are members of their individual plans. The file will contain information on each beneficiary that includes contact information, work and community engagement exemption and compliance information, type of exemption, number of months of cumulative non-compliance, compliance status for the current month, and renewal month. This level of detail will allow our partners to conduct specific outreach and education encouraging beneficiaries to participate and complete work activities.

### **Summary**

Arkansas appreciates the opportunity to help our fellow Arkansans begin to move up the economic ladder through the Arkansas Works program with work and community engagement requirements. We have put a great amount of thought and effort into the policy and operational design of this program to make it as successful as possible. We have developed a strong team of partners ready to help these beneficiaries take the steps toward self-sufficiency. We appreciate the continued support and partnership from the Centers for Medicare and Medicaid Services to help us implement this program and look forward to reporting our progress as implementation continues.