



## Department of Medicaid

**Mike DeWine**, Governor  
**Jon Husted**, Lt. Governor

**Maureen M. Corcoran**, Director

April 12, 2019

Rachel Nichols  
Project Officer  
State Demonstrations Group  
Centers for Medicare & Medicaid Services  
Center for Medicaid and CHIP Services  
7500 Security Boulevard, MS S2-02-28  
Baltimore, MD 21244

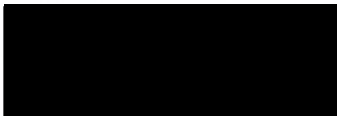
Re: Acceptance of 1115 Group VIII Work and Community Engagement Requirement  
Demonstration (Project Number 11-W-00323/5)

Dear Ms. Nichols:

On behalf of the Ohio Department of Medicaid (ODM), I acknowledge the approval by the Centers for Medicare & Medicaid Services (CMS) of Ohio's section 1115 demonstration project entitled, "Group VIII Work and Community Engagement Requirement" (Project Number 11-W-00323/5). I also accept the Special Terms and Conditions (STCs) for this demonstration project, contingent upon revisions to include the technical corrections contained in Attachment 1.

I want to thank you and all CMS staff for your hard work and commitment to working with Ohio on this initiative. My staff and I look forward to the continued collaboration with CMS as we move forward towards the implementation of this waiver.

Sincerely,



Maureen M. Corcoran  
Director

## Technical Corrections to 11-W-00323/5

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#	Page #	STC	Current Language	Concern	Suggested Modification/Action
1	3	II	approved by the U.S. Department of Agriculture. Food and Nutrition Service beneficiaries who participate in Specialized Recovery Services Program	General edit	Change the period after 'Agriculture' to a comma.
2	3	II	Other non-exempt beneficiaries will have the opportunity to avoid the consequences of noncompliance by demonstrating a good cause for failure to meet the requirement.	General edit	Add a 'the' prior to 'Specialized Recovery Services Program'.
3	3	II	(for no more than 30 days per calendar year unless combined with another qualifying activity and less than half the required hours is spent in job search or job readiness programs or job search is the only activity completed)	General edit	Change 'noncompliance' to 'non-compliance'.
4	3	II	Under Ohio's demonstration, after a beneficiary is determined eligible for Medicaid, the state will notify beneficiaries of whether they are required to participate in community engagement activities as a condition of eligibility or whether they are exempt.	General edit	Change 'required hours is spent' to 'required hours are spent'.
5	4	II	The state must include, at a minimum, in its transition	Clarification	The community engagement requirement is a condition of continued eligibility. Add 'continued' prior to 'eligibility'.
6	6	9(b)		General edit	Remove the extra space prior to 'in'.



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7	8	10(d)	FFP will be limited to normal closeout costs associated with the expiration of the demonstration authority including services, continued benefits as a result of beneficiaries' appeals, and administrative costs of disenrolling beneficiaries.	General edit	Change 'beneficiaries' to 'beneficiaries'.
8	8	11	If a waiver or expenditure authority is withdrawn, FFP is limited to normal closeout costs associated with terminating the waiver or expenditure authority, including services, continued benefits as a result of beneficiary appeals, and administrative costs of disenrolling beneficiaries.	General edit	Change 'beneficiary appeals' to 'beneficiaries' appeals'.
9	12	26	After implementation of the community engagement requirement, after a beneficiary is determined eligible for Medicaid (for new applicants), or, following Medicaid eligibility renewal (for current beneficiaries) the state will notify beneficiaries of whether they are required to participate in community engagement activities as a condition of continued eligibility or whether they are exempt.	General edit	After implementation of the community engagement requirement, <b>after when</b> a beneficiary is determined eligible for Medicaid (for new applicants), or, following Medicaid eligibility renewal (for current beneficiaries) the state will notify beneficiaries of whether they are required to participate in community engagement activities as a condition of continued eligibility or whether they are exempt.



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10	12	26	N/A	General edit	The bullet for STC 26 is listed as Times New Roman – font size 11, but STC 27 is listed as Time New Roman – font size 12.
11	13	28(c)(ii)	Beneficiaries will automatically be re-enrolled in Medicaid, if <ul style="list-style-type: none"> <li>a. they are determined to be eligible for Medicaid in a category that is not subject to the community engagement requirement,</li> <li>b. they are determined to qualify for an exemption from the community engagement requirement, or</li> <li>c. they demonstrate good cause for failure to meet the requirement.</li> </ul>	Beneficiaries who meet Medicaid eligibility (regardless of the CE Requirement) will automatically be re-enrolled in Medicaid. Bullets (a) through (c) are not applicable until after re-enrollment in Medicaid. Once re-enrollment is successful, the beneficiary will be determined mandatory or exempt in relation to the CE Requirement.	(ii) Beneficiaries will automatically be re-enrolled in Medicaid if they are determined to be eligible for any category of coverage; (iii) Beneficiaries subject to the community engagement requirement will be determined to meet an exemption, have good cause, or be required to participate in a qualifying activity.

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12	14	29(b)(ii)	In cases where the state cannot locate data through available systems and data sources, beneficiaries can attest to compliance with, or qualification for an exemptions from, the community engagement requirement in a manner consistent with 42 CFR 435.945	General edit	Change 'exemptions' to 'exemption'.
13	14	29(b)(iv)	The state uses available systems and data sources to verify that beneficiaries are meeting the community engagement requirement or are exempt from the requirements	General edit	Change 'requirements' to 'requirement'.
14	16	29(o)	determine whether there should be further exemptions from the community engagement requirements and/or additional mitigation strategies, so that the community engagement requirements will not be unreasonably burdensome for beneficiaries to meet	General edit	Change 'requirements' to 'requirement'.