

State	<i>Ohio</i>
Demonstration name	<i>Group VIII Work Requirement and Community Engagement 1115 Demonstration Waiver</i>
Approval date	<i>March 15, 2019</i>
Approval period	<i>March 15, 2019 – February 29, 2024</i>
Implementation date	<i>January 1, 2021</i>
Demonstration Year	<i>Demonstration Year 1: March 15, 2019 – February 29, 2020</i>
Reporting Period	<i>Waiver Quarter: 2/2019</i>

Table of Contents

Executive Summary.....	3
Program Design.....	3
Implementation Plan.....	3
Communication Strategy	4
Evaluation Design	5
Systems Requirements	6
Outstanding Issues.....	7
Challenges and Barriers	7

Executive Summary

Since approval of Ohio's *Group VIII Work Requirement and Community Engagement Demonstration* (the 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 development of the Work and Community Engagement Requirement (the Requirement), which has been, and will continue to be, used by ODM to monitor progress toward implementation.

The second Quarterly Monitoring Report provides a general operational status regarding implementation rather than reporting on the components described in Special Terms and Conditions (STC) 35. The report uses the same format as the first Quarterly Monitoring Report, organizing information into the following subsections: Program Design, Implementation Plan, Communication Strategy, Evaluation Design, Systems Requirements, Outstanding Issues, and Challenges and Barriers. The information described in each subsection reflects broad goals, new planned activities, and milestones achieved. It is important to note that this report is limited to activities that occurred during this reporting period.

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 continues to evaluate the program design and regularly communicates with key stakeholders, such as the Ohio Department of Job and Family Services (ODJFS), to ensure issues are addressed. Process flows continue to be updated as 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); however, ODM received an extension from CMS to submit the Implementation Plan on or before October 11, 2019. The draft Implementation Plan was submitted to CMS on October 11, 2019.

As required by STC 33 and CMS guidance, the draft Implementation Plan describes key policies and implementation activities, including: application assistance; reporting and processing; notices; coordinated agency responsibilities; coordination with other programs; appeals; renewals; beneficiary protections; and outreach. ODM developed descriptions of these activities in coordination with and based on feedback from key partners, including ODJFS. At the time of submission of this Quarterly Monitoring Report, CMS is still reviewing the draft Implementation Plan. Once feedback is received, ODM will work with CMS to modify and finalize the Implementation Plan for incorporation into the STCs.

Communication Strategy

ODM remains committed to a meaningful communication strategy that will engage and timely educate key stakeholders regarding the Requirement and implementation activities. Planned communication activities are described in the draft Implementation Plan currently under review by CMS. The information summarized below, while not an exhaustive list, describes key communication activities described in the draft Implementation Plan that also are part of the overall communication strategy.

- A public-facing website will be used to communicate Requirement policies and implementation updates, as well as other broad outreach activities that are specifically targeted to beneficiaries who have lost coverage.
- ODM will ensure it can reach rural areas and areas that may not have easy access to the internet by sending communications by mail. The state will identify important Requirement notices with a different colored envelope to alert the beneficiary that the information is important.
- In addition to information posted on the website, information regarding the Requirement will be shared via social media and through press releases as applicable. Any changes to the Requirement will be communicated to existing beneficiaries via mailed notices.
- Beneficiary notices will be developed regarding Requirement policies on the following topics:
 - When the community engagement requirement will commence
 - The number of required community engagement hours and frequency of completion
 - How to report compliance and at what frequency
 - Specific activities that may be used to satisfy the community engagement requirement
 - Populations that are considered exempt
 - Reporting good cause exceptions and a list of these exceptions
 - Disenrollment for non-compliance
 - How to reactivate benefits after disenrollment
- ODM will hold quarterly roundtable discussions and webinars as needed to share and gather feedback from partners regarding the Requirement.
- ODM will provide an FAQ for internal staff regarding the Requirement to be used for responding to beneficiary questions. Copies of all notices and forms, recorded webinars, and FAQs will be stored internally for staff to reference.
- ODM will provide pre-approved scripts for call center staff to ensure communication can be understood by all beneficiaries. Interpretation services will be available for beneficiaries with limited English proficiency via the call center. All notices and scripts will go through a formal approval process to ensure notices and scripts are easy to comprehend.
- ODM will develop training programs, which will include training for county JFS workers.
- ODM will provide call center training to ensure representatives understand the process and are familiar with resources for beneficiaries subject to the Requirement. Call center training will include:
 - Requirement policies
 - Exemption and good cause exception reporting

Ohio Group VIII Work Requirement and Community Engagement
Demonstration Year 1: March 15, 2019 – February 29, 2020
Waiver Quarter: 2/2019
Submitted on December 6, 2019

- Disenrollment for non-compliance
- How to reactivate benefits after disenrollment

A timeline of specific beneficiary communication activities, also described in the draft Implementation Plan, are summarized below. This is not an exhaustive list; but rather identifies core beneficiary engagement activities.

- From now through July 2020, beneficiaries will receive updates regarding the Requirement via a combination of the agency's website, social media, and through press releases.
- From July 2020 through December 2020, existing beneficiaries will receive mailed notices regarding general Requirement policies. Updates via the agency's website, social media, and through press releases will continue.

ODM continues to refine a comprehensive Communication Plan that identifies key stakeholders, both internal and external, and provides a roadmap for appropriate messaging, timing of messaging, and mode of delivery for each stakeholder. To achieve this level of refinement, ODM continues to have regular internal meetings and meetings with partners. As part of those discussions, ODM is considering an RFP for an entity to aid with communication activities, such as development of beneficiary notices.

Evaluation Design

STC 44 requires submission of a draft Evaluation Design to CMS for review within 180 calendar days of Demonstration approval (by September 11, 2019); however, ODM received an extension from CMS to submit the draft Evaluation Design on or before October 9, 2019. The draft Evaluation Design was submitted to CMS on October 8, 2019.

ODM engaged with its academic partner, Government Resource Center (GRC), to develop an Evaluation Design draft that meets high academic rigor standards. GRC 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. GRC 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 leveraged CMS guidance regarding the *Work and Community Engagement Evaluation Design* in developing the draft Evaluation Design to meet CMS's information and formatting expectations.

Although not a requirement, ODM also released its draft Evaluation Design for public comment from August 15, 2019, through August 26, 2019. ODM received comments on the draft Evaluation Design from ten organizations. Comments included recommendations regarding hypothesis refinement, additional reporting, comparison populations, data, and other operational considerations. Several others submitted comments regarding broader Demonstration operations, unrelated to the Evaluation Design. Based on this feedback, ODM made revisions to the draft Evaluation Design, including minor diction changes, subgroup clarifications, and the composition of potential target/comparison groups. The comments have also informed nuanced changes made by ODM and GRC in the development of the survey instrument and qualitative interviews. ODM is currently working on summarizing and responding to these comments, which will be published on the agency's website.

Systems Requirements

Systems requirements broadly describe the updates needed in the state's information technology (IT) systems to support implementation of the Requirement. The goal of systems requirements work is to have all IT systems and system outputs (e.g., beneficiary compliance determinations and notices of action [NOAs]) developed and thoroughly tested by October 2020.

From May 2019 through August 2019, ODM participated in system requirement and high-level design sessions. Additional design sessions will support development of system design documents that will be used as the basis for system development. Design sessions will include the cross-functional and cross-agency resources who participated in the system requirements sessions. In addition to designing the systems to support the Requirement, the design sessions will develop complementary outputs, such as NOAs, forms, and reports. The design sessions will continue through mid-January 2020.

The following systems were the focus of the requirements phase and will continue to be discussed during the design phase.

- **Ohio Benefits**

Ohio Benefits is a state system that ODM uses to determine and manage Medicaid eligibility.

- **OhioMeansJobs**

OhioMeansJobs is a website that county Job and Family Services (JFS) workers currently use for the state's existing SNAP work requirement. Inclusion of Medicaid's Requirement will be considered in planned work on the site's redesign, set to begin in 2020.

- **Interactive Voice Response (IVR)**

ODM is working to update the beneficiary call center response tree to answer beneficiary questions regarding the Requirement.

- **Enterprise Document Management System (EDMS)**

EDMS is an existing system that houses beneficiary forms and scanned documents for Medicaid. ODM is in the process of updating the system to accommodate forms associated with the Requirement and to add taxonomy to scanned documents to identify Requirement forms specifically.

- **Medicaid Information Technology System (MITS)**

ODM will update MITS to reflect the Requirement's impact on claims and encounter data.

- **Enterprise Data Warehouse (EDW)**

EDW is an existing system that stores Medicaid data for reporting. System requirements for Requirement data storage in the EDW have been completed. Data transmission from Ohio Benefits to the EDW is in the process of being developed, and testing is scheduled for October 2020.

Outstanding Issues

ODM has started program design for implementation, but there are several design features that have yet to be developed or finalized. Following is a list of some of these design features (also listed in the first Quarterly Monitoring Report), the development status of which will be reported in future Monitoring Reports¹:

- Policies and procedures
- Outreach and education materials
- Training materials
- Self-appraisal form
- Beneficiary notices
- Updated renewal form
- Revised application to incorporate community engagement post-eligibility requirements

As noted in the first Quarterly Monitoring Report, monitoring metrics and the monitoring protocol were listed as outstanding issues. ODM is in the process of reviewing required and recommended monitoring metrics and considering existing or new data sources as the monitoring protocol is drafted. Additional details regarding the monitoring protocol and monitoring metrics will be addressed in the third Quarterly Monitoring Report, once additional details are available.

Challenges and Barriers

The challenges and barriers described in the first Quarterly Monitoring Report remain the same and are described below. As noted previously, ODM will monitor these and other potential barriers on an ongoing basis to proactively develop strategies for timely resolutions.

Successful implementation will require that ODM address potential barriers and challenges for non-exempt Group VIII beneficiaries to meeting the Requirement, including: availability of sufficient and reliable transportation to and from Requirement activities; adequate communication to beneficiaries and providers about program design, requirements, and supports; and access to sufficient work and community engagement opportunities. ODM will prioritize mitigating these potential barriers for beneficiaries in program design and development.

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. As noted in comments received during the public comment period, several commenters raised concerns about additional work for already stretched county JFS caseworkers. Based on conversations with ODJFS, these concerns remain. ODM will closely monitor these and other potential barriers.

¹ Note to reader: this is not intended to be an exhaustive list; rather, the list captures the features that are more critical to implementation.