



# Monitoring and Evaluation for Eligibility and Coverage Demonstrations



*Community Engagement  
Implementation and  
Monitoring Resources  
Rollout*

*March 14, 2019*

*3:30 PM – 5:00 PM EST*

# Agenda

- I. Welcome and Introductions
- II. Overview of Monitoring and Evaluation for Eligibility and Coverage Demonstrations
- III. Introduction to Implementation and Monitoring Resources
- IV. Guidance for Making the Most of CMS Demonstration Resources
- V. Questions
- VI. Next Steps
- VII. Final Remarks

# Welcome and Introductions

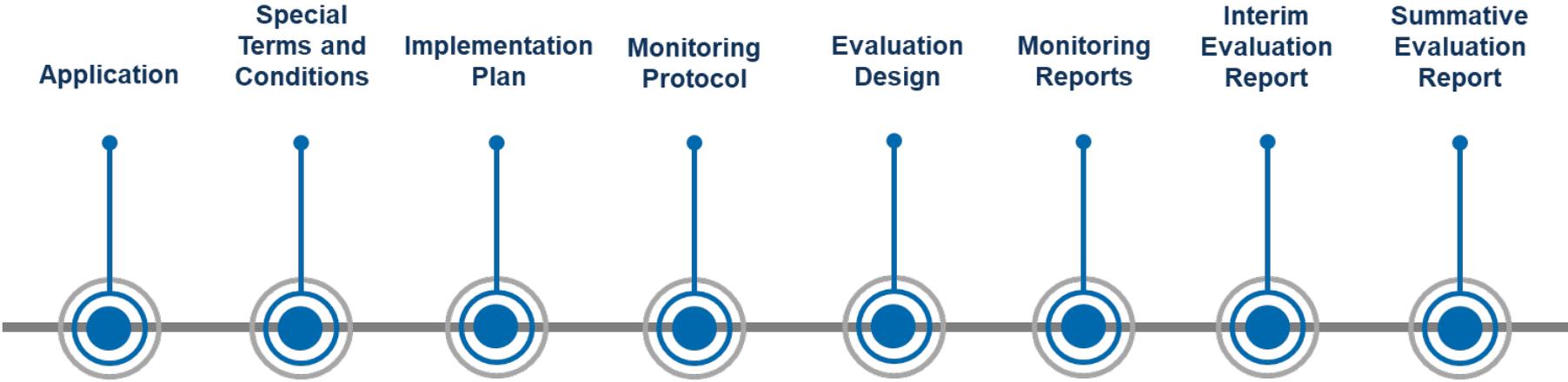
## Speakers

- Teresa DeCaro, Deputy Director, State Demonstrations Group, CMS
- Danielle Daly, Technical Director, Division of Demonstration Monitoring and Evaluation, State Demonstrations Group, CMS
- Jessica Stephens, Director, Division of Enrollment Policy and Operations, Children and Adults Health Programs Group, CMS

# Importance of Monitoring and Evaluation

- All section 1115 demonstrations are policy experiments that must be carefully implemented, monitored, and evaluated (CFR 432.420, 432.424, 432.428)
- With robust and more standardized reporting, states can make course corrections as needed, and learning within and across states can be accelerated
- Along the lines of section 1115 demonstrations focusing on substance use disorders, CMS has developed monitoring and evaluation resources for community engagement (CE)
- CMS is developing similar resources for other eligibility and coverage policies, including:
  - Retroactive eligibility waivers
  - Premiums
  - Non-eligibility periods
  - Health behavior incentives

# Monitoring and Evaluation Process



# Phased Rollout for Eligibility and Coverage Monitoring and Evaluation Resources

	Community Engagement	Retroactive Eligibility Waivers	Premiums	Non-Eligibility Periods	Health Behavior Incentives	NEMT Waivers
<b>Implementation Plan</b>	X	Spring 2019	Spring 2019	Spring 2019	N/A	N/A
<b>Monitoring Report</b>	X	Spring 2019	Spring 2019	Spring 2019	Spring 2019	*
<b>Monitoring Metrics</b>	X	X	X	X	X	*
<b>Evaluation Guidance</b>	X	X	X	X	*	*

X = Included in initial rollout

\* = See general guidance for monitoring and evaluation

N/A = Not applicable; there is no standardized resource for the particular policy type

# Monitoring and Evaluation Rollout Webinars

- In two separate webinars, CMS is providing an overview of monitoring and evaluation resources for eligibility and coverage demonstrations, with a focus on CE
- CMS is releasing CE implementation, monitoring, and evaluation resources on March 14

CE Implementation and Monitoring Rollout Webinar  
March 14, 2019



CE Evaluation Rollout Webinar  
March 19, 2019

# Introduction to Implementation and Monitoring Resources

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# Implementation and Monitoring Resources

Resource <sup>1</sup>	Description
Implementation plan	<ul style="list-style-type: none"> <li>▪ Documents state approach to implementation</li> <li>▪ Informs monitoring and evaluation activities for the demonstration</li> </ul>
Monitoring protocol	<ul style="list-style-type: none"> <li>▪ Describes what state will report on a quarterly and annual basis, developed collaboratively between CMS and the state</li> </ul>
Monitoring report <sup>2</sup>	<ul style="list-style-type: none"> <li>▪ Includes qualitative summaries on metrics trends and implementation updates</li> <li>▪ Provides standardized quarterly and annual monitoring metrics</li> </ul>

<sup>1</sup> These resources are being finalized for review and approval by OMB through the Paperwork Reduction Act (PRA).

<sup>2</sup> Along with the monitoring report, states submit budget neutrality information. CMS is rolling out the new budget neutrality workbook state by state and expects all states to be using it by the end of 2019.

# Development Process for Implementation and Monitoring Resources

- Subject matter experts developed these resources to support implementation and monitoring activities for CE demonstrations
- The content was informed by the State Medicaid Director Letter (SMD 18-002) and approved states' STCs
- CMS shared the implementation and monitoring resources with a monitoring advisory group with participants from 11 states
- The advisory group provided written feedback. CMS revised the resources based on that feedback

# Implementation Plan

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# Key CE Implementation Topics

1. Specify CE policies
2. Establish beneficiary supports and modifications
3. Establish procedures for enrollment, verification, and reporting
4. Operationalize strategies for non-compliance
5. Develop comprehensive communications strategy
6. Establish continuous monitoring
7. Develop, modify, and maintain systems

# Implementation Plan

## Section 1115 Eligibility and Coverage Demonstration Implementation Plan

**Overview:** The implementation plan documents the state's approach to implementing eligibility and coverage policies. It also helps establish what information the state will report in its quarterly and annual monitoring reports. The implementation plan does not usurp or replace standard CMS approval processes, such as advance planning documents, verification plans, or state plan amendments.

## 2. Required implementation information, by eligibility and coverage policy

Answer the following questions about implementation of the state's eligibility and coverage demonstration. States should respond to each prompt listed in the tables. Note any actions that involve coordination or input from other organizations (government or non-government entities). Place "NA" in the summary cell if a prompt does not pertain to the state's demonstration. Answers are meant to provide details beyond the information provided in the state's special terms and conditions. Answers should be concise, but provide enough information to fully answer the question.

This template only includes CE policies.

Prompts	Summary
<b>CE.Mod_1. Specify community engagement policies</b>	
<i>Intent: To describe in more detail the CE policies outlined in the state's STCs.</i>	
1.1 Describe how the state will define exempt populations, including additional details about how these exemptions are defined and how long exemptions will last if applicable:	
a) Full-time student status	<i>a) Full-time student status</i>
b) Medical frailty and other medical conditions	<i>Example: The state exempts full-time high school, college, and graduate students are exempt. The state defines full time student status for college and graduate students as a minimum of at least 12 credit hours per semester (or the equivalent) at an accredited institution of higher education. The state will use the Board of Education's definition of full-time high school status, found in its reporting guidelines and procedures (link). College and graduate students must continue to meet these requirements to qualify for the CE exemption. High school students will remain exempt even if they do not meet these requirements during their summer break.</i>
c) Pregnancy	<i>b) Medical frailty and other medical conditions</i>
d) Acute medical condition	
e) Former foster care youth	
f) Beneficiaries in substance use disorder treatment	<i>c) Pregnancy</i>

# 1. Specify CE Policies

**Intent:** To describe in more detail the CE policies outlined in the state's STCs

## Example prompts:

1.1 Describe how the state will define exempt populations, including additional details about how these exemptions are defined and how long exemptions will last if applicable:

- a) Full-time student status
- b) ...

1.3 Describe how the state will determine circumstances that give rise to good cause and how these circumstances will be reviewed. Describe how the state will determine how long individual good cause circumstances will apply.

1.4 Provide additional details on how the state will define the following compliance actions:

- a) Opportunity to cure/grace periods
- b) Suspension
- c) Termination
- d) Non-eligibility period
- e) Other compliance actions

## 2. Establish Beneficiary Supports and Modifications

**Intent:** To describe how states will provide supports to beneficiaries to ensure that they are able to meet CE requirements

### **Subtopics:**

Specific supports

Ensure that CE activities are available and accessible

Reasonable modifications for individuals with disabilities

### **Example prompts:**

2.1 Describe planned transportation supports and how the state will connect beneficiaries with those supports.

2.2 Describe planned child care supports and how the state will connect beneficiaries to those supports.

2.3 Describe planned language support services for non-English-speaking beneficiaries and how the state will connect beneficiaries with those supports.

## 3. Establish Procedures for Enrollment, Verification, and Reporting

**Intent:** To describe modifications to enrollment processes as well as verification and reporting of activities and exemptions

### **Subtopics:**

Modifications to application, enrollment, and renewal procedures  
Procedures for beneficiaries to report CE activities  
Procedures for CE entities to report CE activities  
Procedures for beneficiaries to report or file for an exemption  
State verification of CE activities and exemptions

### **Example prompts:**

- 3.1 Describe any planned changes to the state's application(s) and application/enrollment processes to identify beneficiaries subject to or exempt from CE requirements.
- 3.2 Describe any planned changes to the state's renewal processes for the CE demonstration population. For example, will the state update any pre-populated renewal forms to capture information on CE compliance or exemptions?
- 3.4 Describe how beneficiaries will report compliance with CE requirements. For example, what are the modalities to report hours and how frequently are beneficiaries required to report?

## 4. Operationalize Strategies for Noncompliance

**Intent:** To describe how states will implement the policies for beneficiaries who do not comply with CE requirements

### **Subtopics:**

Strategies for beneficiaries at risk for noncompliance

Stopping payments to managed care

Re-enrollment after disenrollment for noncompliance

Appeals process

### **Example prompts:**

4.1 Describe how the state will identify beneficiaries at risk of noncompliance.

4.2 Describe what strategies the state will use to assist beneficiaries at risk of noncompliance in meeting the requirements.

4.3 Describe how the state will implement the following compliance actions, including what processes the state will implement to identify and track beneficiaries in these statuses:

a) Suspension

b) ...

## 5. Develop Comprehensive Communications Strategy

**Intent:** To describe how the state will communicate CE policies and procedures (as necessary) to internal and external stakeholders (beneficiaries, partners, staff/other internal entities)

### **Subtopics:**

Beneficiary communication

Partner communications

Staff/internal communications

### **Example prompts:**

5.1 Provide details on the state's plan to communicate to current beneficiaries and new applicants/beneficiaries about general CE policies, including when community engagement requirements will commence, the number of required community engagement hours and frequency of completion,...

5.2 Provide details on the state's plan to communicate to beneficiaries about exempt populations and good cause circumstances. Include details such as how often the state plans to communicate with beneficiaries and through what modes of communication, including what information will be distributed using formal notices.

## 6. Establish Continuous Monitoring

**Intent:** To describe the state's process for conducting process and quality improvement for the CE program

### Example prompts:

6.1 Describe any analyses that the state is planning to conduct to inform its monitoring beyond the CMS required quarterly and annual monitoring reports. Describe the state's process for determining whether changes are needed for the following:

- a) Beneficiaries exempt from community engagement requirements
- b) Qualifying community engagement activities and required hours
- c) ...

6.2 Describe any actions needed to ensure that the state can capture and report required quarterly and annual monitoring metrics. Describe any necessary structural or process changes (i.e. data sharing systems/agreements with MCOs) that the state must make in order to capture and report required quarterly and annual monitoring metrics. IT changes need only be discussed in section 7.

6.3 Describe how the state will assess the availability of accessible transportation supports by region and how the state will address gaps in supports. Note the frequency with which the state will assess the availability of transit and transportation supports.

## 7. Develop, Modify, and Maintain Systems

**Intent:** To describe any system changes needed to implement CE policies and meet reporting requirements

### Example prompts:

7.1 Describe whether the state is planning to enhance its eligibility and enrollment systems to determine eligibility for the CE demonstration population.

7.2 Describe whether the state is planning to develop or enhance systems capacities so that beneficiaries can report CE hours.

7.3 Describe whether the state is planning to develop or enhance systems capacities so that CE entities, such as employers, volunteer supervisors, schools, and other institutions, can automatically report CE activities completed by beneficiaries.

7.4 Describe whether the state is planning to develop or enhance systems capacities to integrate data from other public programs, such as SNAP and TANF.

7.5 Describe any systems modifications that the state is planning to operationalize the suspension of benefits and/or termination of eligibility. ...

# Monitoring Protocol and Report

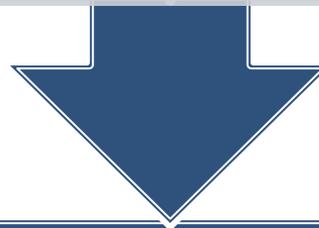
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# Overview of Monitoring Resources

## Monitoring Protocol

Describes plan for what state will report;  
documents any limitations

Developed collaboratively between CMS  
and the state



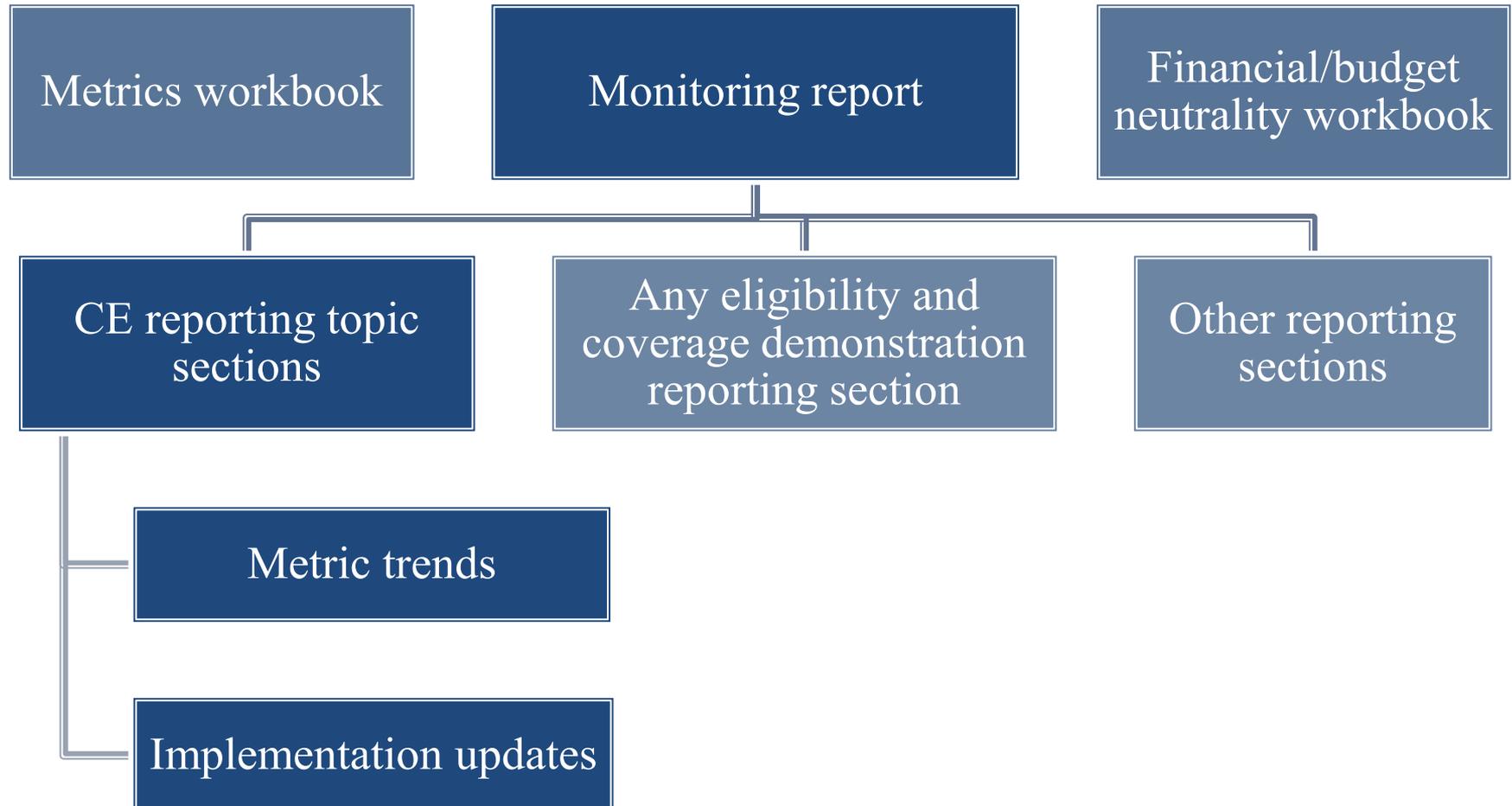
## Monitoring Report

Standardized quarterly and annual  
monitoring report format for  
demonstrations

Includes structured tables for reporting:

1. Quantitative metrics
2. Qualitative information

# Monitoring Report Structure



# Eligibility and Coverage Metric Modules\*

Module	Demonstration Type	Metric # Prefix	Number of Metrics
1	<b>Any demonstration</b> with premiums, marketplace-focused premium assistance, health behavior incentives, community engagement, or retroactive eligibility waivers	AD	45
2	Demonstrations with <b>premiums</b> or other monthly financial contributions	PR	21
3	Demonstrations with <b>marketplace-focused premium assistance</b>	PA	3
4	Demonstrations with <b>incentives for health behaviors</b>	HB	7
5	Demonstrations with <b>community engagement requirements</b>	CE	46
6	Demonstrations with <b>retroactive eligibility waivers</b>	RW	3
Total			125

\*Technical specifications for these metrics are forthcoming.

# Module 1: Metrics for Any Demonstration with Eligibility and Coverage Policies

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1. Enrollment

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2. Mid-year loss of demonstration eligibility

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3. Enrollment duration at time of disenrollment

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4. Renewal

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5. Cost-sharing limit

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6. Appeals and grievances

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7. Access to care

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8. Quality of care and health outcomes

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9. Administrative cost

# Module 5: Metrics for Demonstrations with CE Requirements

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1. CE enrollment

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2. CE requirement qualifying activities

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3. Basis of beneficiary exemptions from CE requirement

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4. Supports and assistance

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5. Reasonable modifications for beneficiaries with disabilities

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6. New suspensions and disenrollments during the measurement period

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7. Reinstatement of benefits after suspension

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8. Re-entry after disenrollment

# Monitoring Metric Trends

Prompts	Demonstration year (DY) and quarter first reported	Metric(s) (if any)	Summary
<b>CE.Mod 1. Specify community engagement policies</b>			
<b>CE.Mod 1.1 Metric trends</b>			
1.1.1 Discuss any data trends related to the overall community engagement enrollment count. Describe and explain changes (+ or -) greater than two percent.	<i>Example: DY1, Qtr. 2</i>	<i>CE_1-8</i>	<i>Example: The number of beneficiaries subject to community engagement requirements in our state in the last quarter decreased by 5 percent. This was due in part to an increase in the number of exemptions for homeless beneficiaries.</i>

<b>Metrics Reporting (CE)<sup>a</sup></b>			
#	Metric name	Metric description	Data source
<b>Topic 1: Specify community engagement policies</b>			
CE_1	Total beneficiaries subject to the community engagement requirement, not exempt	The number of beneficiaries enrolled in the demonstration whose income and eligibility group were subject to the community engagement requirement and who did not have an individual exemption from the requirement.	Administrative records
CE_2	Beneficiaries subject to community engagement requirement and in suspension status due to failure to meet requirement	The number of demonstration beneficiaries in suspension status due to failure to meet the community engagement requirement, including those newly suspended for noncompliance during the measurement period	Administrative records
CE_3	Beneficiaries with approved good cause circumstances	The number of beneficiaries enrolled in the demonstration who met the state criteria for good cause circumstances, such as serious illness, birth or death of a family member, severe weather, family emergencies, or life-changing event	Administrative records
CE_4	Beneficiaries subject to community engagement requirement and in suspension status due to failure to meet requirement	The number of demonstration beneficiaries in suspension status due to failure to meet the community engagement requirement, including those newly suspended for noncompliance during the measurement period	Administrative records
CE_5	Beneficiaries subject to the community engagement requirement and receiving benefits who met the requirement for qualifying activities	The number of beneficiaries enrolled in the demonstration who were subject to the community engagement requirement and met the requirement by engaging in qualifying activities	Administrative records

# Implementation Updates

## Approach

- The state should provide a narrative that compares the demonstration design and operational details outlined in the implementation plan to any changes the state has made since submitting its implementation plan.
- If the state has not made any changes since the last monitoring report, and does not plan to make any changes, the state should mark the checkbox in the table indicating that there are no implementation updates to report for that topic.

## Example prompt:

Compared to the demonstration design details outlined in the implementation plan, describe any changes or expected changes in transportation, childcare, language services, or other supports.

# Implementation Updates

## CE.Mod 1.2 Implementation update

1.2.1 Compared to the demonstration design details outlined in the implementation plan, describe any changes or expected changes to how the state defines:

- a) Beneficiaries exempt from community engagement requirements
- b) Qualifying community engagement activities and required hours
- c) Reporting frequency and hours measurement
- d) Situations that give rise to good cause
- e) Compliance actions
- f) Other policy changes

*Example:  
DYI, Qtr. 2*

*Example: In our implementation plan, exempt homeless beneficiaries were defined as those experiencing chronic homelessness for at least 6 months. However, after an analysis of the burden of reporting community engagement hours for this population, the state, in consultation with CE partners and CMS, has decided to change the definition to those experiencing chronic homelessness for at least 3 months. This change has increased the number of beneficiaries that qualify for an exemption due to homelessness.*

*[Add rows as needed]*

The state has no implementation updates to report for this reporting topic.

# Guidance for Making the Most of CMS Demonstration Resources

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# Customizing Implementation and Monitoring Templates

- The templates are designed to be flexible to allow states to address a wide range of demonstration designs
- States should customize the content to reflect state-specific policies, but should not modify the structure of the templates. The structure supports ease of CMS review over time and across states. (Once the templates are approved by OMB through the PRA they will be required.)
- The monitoring protocol allows states an opportunity to work with CMS to define which metrics and qualitative information you will submit in your monitoring reports
- Customization should happen in consultation with CMS; CMS monitoring subject matter experts are available for technical assistance

# TA to Support Implementation and Monitoring

CMS is available to support states in using these templates and customizing them as necessary. States are strongly encouraged to reach out if they have questions. States can:

1. Reach out to your Project Officer, who can either answer questions directly or connect states with appropriate CMS staff
2. Submit general questions to the Technical Assistance mailbox: [1115MonitoringAndEvaluation@cms.hhs.gov](mailto:1115MonitoringAndEvaluation@cms.hhs.gov)

# Questions?

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## Next Steps

- CMS will work with states with approved CE demonstrations to meet the timelines in their Special Terms and Conditions (STCs) for planning documents
  - On a case by case basis, adjustments will be made to the timeline if needed
  - In general, states will need to have an implementation plan approved by CMS before a monitoring protocol can be reviewed
- CMS recommends that states with pending or approved CE demonstrations discuss submissions with CMS

# Final Remarks

- Thank you again for participating in the CE Implementation and Monitoring Rollout webinar!
- We value your time and questions, and encourage you to email the Monitoring and Evaluation inbox at:  
[1115MonitoringAndEvaluation@cms.hhs.gov](mailto:1115MonitoringAndEvaluation@cms.hhs.gov)

**The webinar on evaluation of eligibility and coverage policies is**

**March 19th from 12:30 – 2:00 PM EST**