



**Overview:** The Monitoring Report for the section 1115 demonstrations consists of a Monitoring Report Workbook (Part A), Monitoring Report Template (Part B), and a Budget Neutrality Workbook (Part C). This Part B Template is specifically customized for the state of Georgia for its Georgia Pathways to Coverage demonstration and aligns with applicable requirements in the demonstration’s special terms and conditions (STCs). For more information and any questions, the state should contact the CMS section 1115 demonstration team.<sup>1</sup>

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<sup>1</sup> This version of Georgia’s Monitoring Report Template (Part B) consists of the qualifying hours and activities requirement, non-applicability of retroactive eligibility policy, and the Health Insurance Premium Payment program for employer sponsored insurance in the Pathways demonstration. As the state implements the remaining policies in its demonstration, CMS and the state will coordinate to update this Monitoring Report template to include those additional policies.

## **1. Title page for the state’s demonstration**

*The state should complete this title page as part of its Quarterly Monitoring Report.*

*This section collects information on the approval features of the state’s section 1115 demonstration overall, followed by information for each demonstration policy. The state completed this title page as part of its Georgia Pathways to Coverage Monitoring Protocol. The state should complete this table using the corresponding information from its CMS-approved Monitoring Protocol and submit this as the title page of all Monitoring Reports. The content of this table should stay consistent over time. Definitions for certain rows are below the table.*

Overall section 1115 demonstration	
State	Georgia
Demonstration name	Georgia Pathways to Coverage
Approval period for section 1115 demonstration	10/15/2020 – 09/30/2025
Demonstration year and quarter	DY4Q4
Reporting period	07/01/2024 – 09/30/2024
Budget neutrality	<input checked="" type="checkbox"/> The state attests that it is submitting a budget neutrality report for this reporting period.
Qualifying hours and activities requirement	
Qualifying hours and activities requirement effective date <sup>a</sup>	10/15/2020
Implementation date, if different from qualifying hours and activities effective date <sup>b</sup>	07/01/2023
Health Insurance Premium Payment program	
Health Insurance Premium Payment program effective date <sup>a</sup>	10/15/2020
Implementation date, if different from Health Insurance Payment premium Program date <sup>b</sup>	01/06/2024
Non-applicability of retroactive eligibility	
Non-applicability of retroactive eligibility effective date <sup>a</sup>	10/15/2020
Implementation date, if different from non-applicability of retroactive eligibility effective date <sup>b</sup>	N/A

<sup>a</sup> **Demonstration effective dates:** For monitoring purposes, CMS defines the effective date of the demonstration as the effective date listed in the state's STCs at time of the demonstration approval including qualifying hours and activities requirement, the Health Insurance Premium Payment program, and non-applicability of retroactive eligibility policy. For example, if the state's STCs at the time of the demonstration approval note that the demonstration is effective January 1, 2024 – December 31, 2028, the state should consider January 1, 2024 to be the effective date of the demonstration. Note that the effective date is considered to be the first day the state may begin its demonstration. In many cases, the effective date is distinct from the approval date of a demonstration; that is, in

certain cases, CMS may approve a section 1115 demonstration with an effective date that is in the future. For example, CMS may approve an extension request on December 15, 2023, with an effective date of January 1, 2024 for the new demonstration period. In many cases, the effective date also differs from the date a state begins implementing its demonstration.

<sup>b</sup> **Implementation date of policy:** The date of implementation for the demonstration policy in the state's demonstration.

## 2. Executive summary

*The executive summary should be brief with a recommended word limit of 500 words. However, if the state believes additional information is important, the state can choose to provide additional detail beyond the recommended word limit.*

*The following executive summary covers DY4Q4.*

The Georgia Pathways to Coverage program successfully launched on July 1, 2023. The State started receiving applications during the month of July 2023, and the earliest enrollments into the Pathways program were effective August 1, 2023. Members enrolled into one of the State's three contracted Care Management Organizations (CMOs). On January 6, 2024, the Mandatory Health Insurance Premium Payment (HIPP) Program launched. Members began being referred to the Third-Party Liability (TPL) vendor for a cost-effectiveness determination in mid-January 2024.

In November 2023, the State added an additional screen in the application screen flow in Customer Portal. This screen provides information on the Pathways program and asks the applicant if, after reading about the program, they are still interested in the program. If the applicant selects 'no,' they are not presented with additional Pathways screens.

Since the launch of Pathways, the State has regularly distributed informational materials on the program through organic social media channels and in the form of toolkits sent directly to program stakeholders. The State scaled marketing and outreach efforts in August 2024 to increase awareness of the program and encourage potentially eligible individuals to apply. Marketing advertisements ran on traditional (e.g., Broadcast TV/Radio, print, transit ads), digital (e.g., streaming TV/radio), and social media (e.g., Meta) channels. Outreach efforts leveraged existing relationships that organizations have with potential Pathways members to share information, encourage applications, and establish a Pathways presence at existing community events. As of September 2024, 71,292 applicants submitted a complete Pathways application. Of those, 52,717 received an eligibility determination. Of those receiving an eligibility determination, 16% were approved for Pathways; 27% were approved for Traditional Medicaid; and 57% were determined ineligible for Traditional Medicaid and Pathways. The top three qualifying activities submitted at application are employment, higher education, and self-employment. Applicants were determined ineligible for Pathways and Medicaid primarily due to reasons related to being over income (and potentially eligible for Marketplace coverage), no responses or incomplete responses to requests for verification of information needed to make an eligibility determination, and failure to meet qualifying hours and activities. There were also 18,575 applicants who submitted a complete Pathways application and had not received an eligibility determination yet as of September 2024.

**Instructions:** The state should complete tables 3 and 4 to provide narrative information on metrics trends, implementation updates, and other demonstration reporting topics. For metrics trends, the state should mention in the “State Response” column any notable changes in metrics reported between the previous measurement period to the current measurement period. For implementation updates, the state should make note of any changes or expected changes in relation to the demonstration’s special terms and conditions (STCs) or approved implementation plan in the “State Response” column.

### 3. Narrative information on implementation by demonstration policy

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
<b>1. Qualifying Hours and Activities</b>			
<b>1.1 Metric trends</b>			
Discuss any data trends related to: <ul style="list-style-type: none"> <li>a. Good cause exceptions</li> <li>b. Suspension and disenrollment</li> <li>c. Reinstatement and reenrollment</li> </ul>	X	<ul style="list-style-type: none"> <li>a. <i>S47-48_GA; S77-79_GA</i></li> <li>b. <i>S51-54_GA; S83-84_GA</i></li> <li>c. <i>S55-57_GA; S85_GA</i></li> </ul>	The State has not suspended or terminated members for failing to meet qualifying hours and activities on a monthly basis. The State is continuing the pause of suspensions and terminations for failure to meet qualifying activities on a monthly basis beyond January 2025. Metrics will be provided when suspensions and terminations reactivate.
<b>1.2 Implementation update</b>			

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
<p>Compared to the demonstration design details outlined in the implementation plan, describe any changes, or expected changes to how the state defines:</p> <ul style="list-style-type: none"> <li>a. Qualifying activities and required hours</li> <li>b. Reporting frequency and hours measurement</li> <li>c. Situations that give rise to good cause</li> <li>d. Compliance actions</li> <li>e. Other policy changes</li> </ul>			<ul style="list-style-type: none"> <li>a. There were no additional changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element in this quarter.</li> <li>b. There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element.</li> <li>c. There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element.</li> <li>d. The State paused suspensions for failure to report qualifying hours and activities. Individuals who did not report their qualifying hours and activities were not suspended from the program. Similarly, terminations for failure to report qualifying hours and activities for three consecutive months are also paused.</li> <li>e. There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element.</li> </ul>
<b>2. Reasonable modification</b>			
<b>2.1 Metric trends</b>			
Discuss any data trends related to reasonable modifications.	X	<i>S49-50_GA; S80-82_GA</i>	The State is not currently reporting on metrics related to this element. Data trends are therefore unavailable at this time.
<b>2.2 Implementation update</b>			
Describe how the state is supporting beneficiaries to participate in qualifying hours and activities leveraging other agencies or public or private partnerships to support beneficiaries and address barriers. The state should report any actions, even if the specific number of beneficiaries supported or provided referrals for services cannot be tracked. Additionally, compared to the demonstration design details outlined in the implementation plan, describe any changes, or expected changes to other supports provided. Type of supports and assistance include:			The State continues to support members' participation in qualifying hours and activities in several ways. For example, the State is working with the Georgia Vocational Rehabilitation Agency (GVRA) to provide a reasonable modification for applicants who are interested in the program but are not currently meeting the qualifying activity requirement due to a disability. The State also requires their Care Management Organizations (CMOs) to help their Pathways members understand and stay compliant with the requirements of the Pathways program. The State is

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
<ul style="list-style-type: none"> <li>a. Transportation assistance</li> <li>b. Childcare assistance</li> <li>c. Language support</li> <li>d. Placement assistance</li> <li>e. Other support(s)</li> </ul>			<p>requiring each CMO to develop and implement an engagement plan for its Pathways members, which will include helping members identify training opportunities and other opportunities to meet the qualifying hours and activities.</p> <p>There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding elements a through e.</p> <p>The Evaluation Report will include member experience data regarding barriers to accessing care and/or being in compliance with the qualifying activities requirement. This may include, but is not limited to, transportation, childcare, language supports, and other supports.</p>



Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
<p>Compared to the demonstration design details outlined in the implementation plan, describe any changes, or expected changes:</p> <ol style="list-style-type: none"> <li>To beneficiary supports and assistance.</li> <li>In public programs that the state Medicaid agency is partnering with to leverage existing employment and training supports.</li> <li>That impact the availability and accessibility of qualifying hours and activities.</li> <li>To how the state provides reasonable modifications for beneficiaries with disabilities or connects beneficiaries with disabilities to needed supports and services.</li> </ol>			<ol style="list-style-type: none"> <li>There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element.</li> <li>The State has been sharing informational materials about Pathways with key program stakeholders since launch in July 2023. The State scaled marketing and outreach activities in August 2024, engaging approximately 300 organizations in the first two months of the campaign to share information about Pathways on their own channels, connect potential members to resources where they can receive application assistance, connect potential members to qualifying activity resources, and identify and 21 events that featured Pathways information.</li> <li>There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element.</li> <li>There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element.</li> </ol>
<b>3. Establish procedures for application, transfer, and initial compliance</b>			
<b>3.1 Metric trends</b>			
Discuss any data trends related to application, transfer, and initial compliance.		SI-35_GA	In DY4Q4, the State observed an increase in applicants compared to previous months and quarters. Two factors that may have contributed to this increase are i) changes to the November 2023 additional screen, which was simplified and streamlined in July 2024 and ii) the marketing and outreach campaign, which began in August 2024.
<b>3.2 Implementation update</b>			

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
<p>Compared to the demonstration design details outlined in the implementation plan, describe any changes or challenges to the state's:</p> <ul style="list-style-type: none"> <li>a. Application/enrollment processes to identify beneficiaries subject to qualifying hours and activities requirement.</li> <li>b. Renewal processes for the qualifying hours and activities demonstration population.</li> <li>c. Other planned modifications to the state's eligibility determination and enrollment processes and operations as a result of implementation of qualifying hours and activities requirements.</li> <li>d. Procedures for beneficiaries to report qualifying hours and activities.</li> <li>e. Process for verifying beneficiaries' compliance with qualifying hours and activities requirements.</li> <li>f. Procedures for qualifying hours and activities entities, such as employers, volunteer supervisors, schools, and other institutions, to report community engagement activities, if applicable.</li> </ul>			<ul style="list-style-type: none"> <li>a. There were no additional changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element in this quarter.</li> <li>b. The State has not completed any annual renewals on existing Pathways members.</li> </ul> <p>There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding elements c through f.</p>
<p>Describe the actions taken by the state to use additional data sources or leverage other entities to verify compliance with qualifying hours and activities requirements.</p>			<p>The State has not suspended or terminated members for failing to meet qualifying hours and activities on a monthly basis. The State is continuing the pause of suspensions and terminations for failure to meet qualifying activities on a monthly basis beyond January 2025. Metrics will be provided when suspensions and terminations reactivate.</p>
<b>4. Continued compliance</b>			
<b>4.1 Metric trends</b>			

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
Discuss any data trends related to continued compliance.		<i>S42-46_GA</i>	<p>S42 is not provided because the State postponed suspensions and terminations.</p> <p>S43 remained in the same relative range of applicants exempt from reporting qualifying activities due to 6-month exemption during the quarter. A member receives a 6-month exemption upon reporting monthly QA for 6 consecutive months.</p> <p>S44, S45, and S46 are not currently provided. The State is not currently conducting audits and is not reporting on metrics related to this element. .</p>
<b>4.2 Implementation update</b>			
<p>Compared to the demonstration design details outlined in the implementation plan, describe any changes, or expected changes to:</p> <ol style="list-style-type: none"> <li>Policies around identifying beneficiaries at risk of noncompliance and strategies to assist beneficiaries at risk of noncompliance in meeting the requirements.</li> <li>The process for compliance actions or benefit reactivation (from suspension) and/or reenrollment (from termination) once qualifying hours and activities requirements are met.</li> <li>How a beneficiary who is about to be suspended or disenrolled will be screened for other Medicaid eligibility groups.</li> <li>The renewal process, including changes for beneficiaries in suspension status due to noncompliance with qualifying hours and activities requirements.</li> </ol>			<p>The State has not suspended or terminated members for failing to meet qualifying hours and activities on a monthly basis. The State is continuing the pause of suspensions and terminations for failure to meet qualifying activities on a monthly basis beyond January 2025. Metrics will be provided when suspensions and terminations reactivate.</p>

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
e. The process by which beneficiaries may reenroll after disenrollment or suspension for failure to comply with qualifying hours and activities requirements.			
Report any modifications to the appeals processes for beneficiaries enrolled in the demonstration.			The are no modifications to the appeals process for members enrolled in the demonstration.
<b>5. Health Insurance Premium Payment (HIPP) Program – Employer Sponsored Insurance</b>			
<b>5.1 Metric trends</b>			
Discuss any data trends related to the Health Insurance Premium Payment program.	X	S86-96_GA	Enrollment in the Health Insurance Premium Payment program has low volume. Data trends are therefore unavailable at this time.
<b>5.2 Implementation update</b>			
<p>Compared to the demonstration design details outlined in the implementation plan, describe any changes, or expected changes to:</p> <ul style="list-style-type: none"> <li>a. Policies around identifying individuals referred to a third-party liability vendor for determining cost-effectiveness of HIPP.</li> <li>b. The process for determining cost-effectiveness of HIPP and enrollment in employer sponsored insurance.</li> <li>c. The process by which beneficiaries may reenroll following disenrollment for not transitioning to employer sponsored insurance after receiving a determination that HIPP was cost-effective.</li> <li>d. The timeline required to make a cost-effectiveness determination.</li> <li>e. The reporting requirements and premium payment requirements of HIPP members.</li> </ul>			<ul style="list-style-type: none"> <li>a. There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element.</li> <li>b. There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element.</li> <li>c. There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element.</li> <li>d. The State changed the timeline required to make a cost-effectiveness determination from 21 days to 30 days.</li> <li>e. There are no changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element.</li> </ul>
Describe the actions taken by the state to use additional data sources or procedures to make cost-effectiveness determination.			The State utilizes a vendor to make a cost-effectiveness determination and run the HIPP program. There are no additional

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
			actions taken by the State to use additional data sources or procedures to make a cost-effectiveness determination.
Report any modifications to the appeals processes or reenrollment process for individuals denied Pathways due to a cost-effective determination for HIPP or those involuntarily disenrolled from ESI.			There are no modifications to the appeals process or reenrollment process for individuals denied Pathways due to a cost-effective determination for HIPP or those involuntarily disenrolled from ESI.
<b>6. Develop comprehensive communications strategy</b>			
<b>6.1 Implementation update</b>			
<p>Compared to the demonstration design details outlined in the implementation plan, describe any changes, or expected changes to the state's strategy to communicate with beneficiaries about:</p> <ul style="list-style-type: none"> <li>a. General qualifying hours and activities requirement policies.</li> <li>b. Good cause circumstances.</li> <li>c. Suspension or disenrollment for noncompliance.</li> <li>d. Reactivation following suspension or reentry after disenrollment for noncompliance.</li> </ul>			<ul style="list-style-type: none"> <li>a. The State continues to suppress the notice sent to members on the 4<sup>th</sup> of the month who do not report their qualifying hours and activities by the 3<sup>rd</sup> of the month. The State is sending a notice to members who do not report their qualifying hours and activities by the 17<sup>th</sup> of the month, reminding them that reporting their hours is a requirement of the program but that the State is not currently suspending members. This notice also includes contact information for each CMO, should the member need help finding qualifying hour and activity resources.</li> <li>b. There are no changes or challenges with the demonstration design details outlined in the implementation plan regarding this element.</li> <li>c. The State paused suspensions for failure to report qualifying hours and activities. Individuals who did not report their qualifying hours and activities were not suspended from the program. Similarly, terminations for failure to report qualifying hours and activities for three consecutive months are also paused.</li> <li>d. The State paused suspensions for failure to report qualifying hours and activities. Individuals who did not report their qualifying hours and activities were suspended from the program. Similarly, terminations for failure to report qualifying hours and activities for three consecutive months were also paused.</li> </ul>

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
Describe any outreach or education activities that were conducted with qualifying hours and activities partners, such as qualified health plans, managed care organizations, providers, or community organizations, during this reporting period.			The State scaled the pilot media campaign in August 2024, launching an expanded set of marketing and outreach activities intended to meet the same campaign objectives. Starting in August 2024, marketing advertisements ran on traditional, digital, and social media channels. In the first two months of the campaign, advertisements drove approximately 450,000 people to visit <a href="https://pathways.georgia.gov">pathways.georgia.gov</a> to learn more about the program. Outreach efforts leveraged existing relationships that organizations have with potential Pathways members to share information, encourage applications, and establish a Pathways presence at existing community events. In the first two months of the campaign, the State engaged approximately 300 organizations, which included health providers and associations, qualifying activity providers, community groups, and other government agencies. The State also established a Pathways presence at 21 events, where attendees received Pathways informational resources and on the ground application assistance in partnership with the Division of Family and Children Services (DFCS) workers.
Compared to the demonstration design details outlined in the implementation plan, describe any changes or challenges with: <ul style="list-style-type: none"> <li>a. How materials or communications were accessible to beneficiaries with limited English proficiency, low literacy, in rural areas, and other diverse groups.</li> <li>b. The state's plan to communicate modifications of qualifying hours and activities requirements to beneficiaries with disabilities.</li> </ul>			There are no changes or challenges with the demonstration design details outlined in the implementation plan regarding elements a and b.
Describe any communication or outreach conducted to qualifying hours and activities partner organizations or internal staff training conducted during this reporting period.			The State has been sharing informational materials about Pathways with key program stakeholders since launch in July 2023. The State scaled marketing and outreach activities in August 2024, engaging approximately 300 organizations, including 1-1

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
			conversations with select organizations, in the first two months of the campaign to share information about Pathways on their own channels, connect potential members to resources where they can receive application assistance, connect potential members to qualifying activity resources, and identify and 21 events that featured Pathways information.
<b>7. Establish continuous monitoring</b>			
<b>7.1 Implementation update</b>			
Describe any analyses that the state has conducted to inform its monitoring beyond the required monitoring reports. Describe if these analyses have suggested the need to make changes in any qualifying hours and activities requirement policies.			The State did not conduct any additional analysis to inform it's monitoring beyond the extensive required monthly and quarterly monitoring reports.
<p>Describe whether the state has assessed the availability of:</p> <ul style="list-style-type: none"> <li>a. Transportation</li> <li>b. Childcare supports</li> <li>c. Language supports</li> <li>d. Placement assistance supports</li> <li>e. Other support(s)</li> </ul> <p>If the state has identified any gaps in supports, describe what steps have been taken to address those gaps.</p>			<ul style="list-style-type: none"> <li>a. The State has not assessed the availability of transportation. However, various counties across Georgia offer local transportation resources to residents. Pathways members are made aware of and referred to these resources as applicable when they contact their local DFCS Medicaid office.</li> <li>b. The State has not assessed the availability of childcare supports. However, the State continues to provide information on childcare support for Pathways applicants and members as it does today for other Medicaid applicants and members. This includes but is not limited to referrals and information on local county resources, as well as how to apply for childcare support provided through the Georgia's Department of Early Care and Learning (DECAL).</li> <li>c. The State has not assessed the availability of language supports. However, the State, through a third-party vendor, provides language support services through a language line, which provides telephonic and in- person</li> </ul>

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
			<p>interpretation services for members requiring language assistance. Members can access interpreter services by making a request to a case worker, who will arrange for a live interpreter to come to an appointment or for services to be provided telephonically. Interpretation services are available in more than 300 languages.</p> <p>d. The State has not assessed the availability of placement assistance supports. However, Pathway members are aided in finding opportunities by their CMOs. CMOs help their members remain in compliance with the qualifying hours and activities by providing information, program instruction (such as how to report hours and activities), and on- going support – acting effectively as a case manager and advocate for the participant to succeed in the program and maintain their Pathways eligibility. The State is actively working with CMOs to help them provide support to their members related to qualifying activities.</p> <p>e. The State has not assessed the availability of other supports.</p>
<p>Describe whether the state has conducted an assessment:</p> <p>a. For areas with high unemployment, limited economic opportunities, and/or limited educational activities. If the state has identified any such areas, describe whether the state has adjusted qualifying hours and activities requirements in those areas.</p> <p>b. Of whether reasonable modifications and supports are available for beneficiaries with disabilities by region. Describe how the state will address gaps in supports. Note the frequency with which the state will assess reasonable modifications and the availability of supports.</p>			<p>a. The State has not yet conducted an assessment for areas with high unemployment, limited economic opportunities, and/or limited educational activities.</p> <p>b. The State has not yet conducted an assessment of whether reasonable modifications and supports are available for beneficiaries with disabilities by region.</p>



Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
<b>8. Develop, modify, and maintain systems</b>			
<b>8.1 Implementation update</b>			
Describe if the state has developed or enhanced its systems capabilities as described in the implementation plan for: <ul style="list-style-type: none"> <li>a. Eligibility and enrollment system.</li> <li>b. Qualifying hours and activities reporting for beneficiaries.</li> <li>c. Integration of data from other public programs, such as SNAP and TANF.</li> <li>d. Suspension of benefits and payments and/or termination of eligibility.</li> <li>e. Benefit reactivation and/or reenrollment once qualifying hours and activities requirements are met.</li> <li>f. Other significant systems changes and modifications.</li> </ul>			<ul style="list-style-type: none"> <li>a. There were no additional changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element in this quarter.</li> <li>b. There were no additional changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element in this quarter.</li> <li>c. The State has not yet developed or enhanced its systems capabilities as described in the implementation plan for the integration of data from other public programs, such as SNAP and TANF. This functionality is planned for a future release.</li> <li>d. There were no additional changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element in this quarter.</li> <li>e. There were no additional changes or expected changes to the demonstration design details outlined in the implementation plan regarding this element in this quarter.</li> </ul>
Describe any additional systems modifications that the state is planning to implement.			There are no additional systems modifications that the State is planning to implement.
<b>9. Non-applicability of retroactive eligibility and demonstration requirements</b>			
<b>9.1 Metric trends</b>			
Discuss any data trends related to beneficiaries subject to non-applicability of retroactive eligibility.	X	<i>RW_1-3</i>	There are no data trends related to beneficiaries subject to non-applicability of retroactive eligibility. Coverage in Pathways is prospective only and begins with the first day of CMO enrollment. No retroactive coverage or assistance in paying prior months' medical bills will be provided to individuals enrolling in Pathways.

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
<b>9.2 Implementation update</b>			
<p>Compared to the demonstration design details outlined in the implementation plan, describe any changes or expected changes to:</p> <ul style="list-style-type: none"> <li>a. How the state will determine whether beneficiaries are exempt from non-applicability of retroactive eligibility.</li> <li>b. Medicaid applications to reflect non-applicability of retroactive eligibility.</li> <li>c. The appeals processes for beneficiaries subject to non-applicability of retroactive eligibility.</li> </ul>			<p>There are no changes or expected changes with the demonstration design details outlined in the implementation plan regarding elements a through c.</p> <p>The evaluation will assess member experiences in the context of not having retroactive eligibility. The topic will be explored in member interviews and focus groups and analyzed when considering the administrative cost of implementing and operating the demonstration.</p>
<b>10. Develop comprehensive communications strategy</b>			
<b>10.1 Implementation update</b>			
Compared to the details outlined in the implementation plan, describe any change or expected changes to the state's strategy for communicating to beneficiaries about changes to retroactive eligibility policies.			There are no changes or expected changes to the demonstration details outlined in the implementation plan regarding this element.
<p>Describe any communication or outreach that was conducted with:</p> <ul style="list-style-type: none"> <li>a. Partner organizations, including managed care organizations and community organizations.</li> <li>b. Providers.</li> </ul>			<p>The State has been sharing informational materials about Pathways with key program stakeholders since launch in July 2023. The State scaled marketing and outreach activities in August 2024, engaging approximately 300 organizations, which included health providers and associations, qualifying activity providers, community groups, and other government agencies, in the first two months of the campaign. The State engaged these organizations to share information about Pathways on their own channels, connect potential members to resources where they can receive application assistance, connect potential members to qualifying activity resources, and identify and 21 events that featured Pathways information.</p>

\*The state should remove all example text from the table prior to submission.

**4. Narrative information on implementation for other demonstration reporting topics**

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
<b>1. Metrics and operations for the demonstration overall</b>			
<b>1.1 Metric trends</b>			
<p>Discuss any data trends related to:</p> <ul style="list-style-type: none"> <li>a. Enrollment</li> <li>b. Mid-year loss of demonstration eligibility</li> <li>c. Renewals</li> <li>d. Appeals and grievances</li> <li>e. Access to care</li> <li>f. Use of services</li> </ul>		<ul style="list-style-type: none"> <li>a. <i>S40-41_GA; S58-59_GA</i></li> <li>b. <i>S60-62_GA</i></li> <li>c. <i>S63-68_GA</i></li> <li>d. <i>S69-71_GA</i></li> <li>e. <i>S72-73_GA</i></li> <li>f. <i>S74-76_GA</i></li> </ul>	<ul style="list-style-type: none"> <li>a. Enrollment in the demonstration increased each month throughout the quarter.</li> <li>b. Mid-year loss of demonstration eligibility generally stayed in the same range throughout the year but grew throughout the year.</li> <li>c. The State has not completed any annual renewals on existing Pathways members.</li> <li>d. For bullets d-f, the State is not currently reporting on metrics related to these elements. Data trends are therefore unavailable at this time.</li> </ul>
<b>1.2 Implementation update</b>			
<p>Highlight significant demonstration operations or policy considerations that could positively or negatively impact beneficiary enrollment, compliance with requirements, access to services, timely provision of services, or any other provision that has potential for beneficiary impacts. Also note any activity that may accelerate or create delays or impediments in achieving the demonstration's approved goals or objectives, if not already reported elsewhere in this document. See Monitoring Report Instructions for more detail.</p>			<p>The State has not suspended or terminated members for failing to meet qualifying hours and activities on a monthly basis. The State is continuing the pause of suspensions and terminations for failure to meet qualifying activities on a monthly basis beyond January 2025. Metrics will be provided when suspensions and terminations reactivate.</p> <p>In this quarter, the State decided to begin renewals for Pathways members starting January 2025.</p>
<b>2. Demonstration evaluation update</b>			
<b>2.1 Narrative information</b>			
<p>Provide updates on evaluation work and timeline. The appropriate content will depend on when this report is due to</p>			<p>There are three outstanding deliverables in the current evaluation work timeline. The first being the Evaluation Design, which is currently under review by CMS. Once CMS provides feedback,</p>

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
CMS and the timing for the demonstration. There are specific requirements per 42 Code of Federal Regulations (CFR) § 431.428a(10) for annual [monitoring] reports. See Monitoring Report Instructions for more details.			the State will incorporate the edits. The second deliverable is the Interim Evaluation report. The State is currently performing analyses on the enrollment data to generate a summary of findings and recommendations. The last deliverable is the Summative Evaluation report, which has not yet started.
Provide status updates on deliverables related to the demonstration evaluation and indicate whether the expected timelines are being met and/or if there are any real or anticipated barriers in achieving the goals and timeframes agreed to in the STCs.			There are three outstanding deliverables in the current evaluation work timeline. The first being the Evaluation Design, which is currently under review by CMS. Once CMS provides feedback, the State will incorporate the edits. The second deliverable is the Interim Evaluation report. The State is currently performing analyses on the enrollment data to generate a summary of findings and recommendations. The last deliverable is the Summative Evaluation report, which has not yet started
List anticipated evaluation-related deliverables related to this demonstration and their due dates.			The evaluation deliverables and their due dates (official CMS deadlines) are i) Evaluation Design, which was resubmitted to CMS on September 20 <sup>th</sup> 2024 is currently under review with CMS, ii) Interim Evaluation Report due 12/30/2024, and iii) Summative Evaluation Report due 3/30/2027.
<b>3. Other demonstration reporting</b>			
<b>3.1 General reporting requirements</b>			
Describe whether the state foresees the need to make future changes to the STCs, implementation plan, or monitoring protocol, based on expected or upcoming implementation changes.			The State is currently considering policy changes for inclusion in its waiver extension application, which will be submitted by March 2025. It is possible that any policy changes will require changes to the STCs, the implementation plan, and / or the monitoring protocol.
Compared to the details outlined in the STCs and the monitoring protocol, describe whether the state has formally requested any			The State will formally ask for a reconsideration of submitting monthly reports. The STCs only address quarterly monitoring reports and one Annual Monitoring Report each demonstration

Prompt	State Has No Trends/Update to Report (place an X)	Related Metric(s) (if any)	State Response
<p>changes or whether the state expects to formally request any changes to:</p> <ul style="list-style-type: none"> <li>a. The schedule for completing and submitting monitoring reports.</li> <li>b. The content or completeness of submitted monitoring reports and or future monitoring reports.</li> </ul>			year. The State would like to report on a cadence consistent with what was agreed to in the STCs and consistent with other states' 1115 reporting requirements.
Describe whether the state has identified any real or anticipated issues submitting timely post-approval demonstration deliverables, including a plan for remediation.			The State has not identified any real or anticipated issues submitting timely post-approval demonstration deliverables.
Provide updates on the results of beneficiary satisfaction surveys, if conducted during the reporting year, including updates on grievances and appeals from beneficiaries, per 42 CFR 431.428(a)5.			No additional beneficiary satisfaction surveys have been conducted by the State during the reporting period.
<b>3.2 Post-award public forum</b>			
If applicable within the timing of the demonstration, provide a summary of the annual post-award public forum held indicating any resulting action items or issues. A summary of the post-award public forum should be included here for the period during which the forum was held and in the annual monitoring report.			N/A - No post-awards were received in this quarter.
<b>4. Notable state achievements and/or innovations</b>			
<b>4.1 Narrative information</b>			
Provide any relevant summary of achievements and/or innovations in demonstration enrollment, benefits, operations, and policies (1) pursuant to the demonstration hypotheses or (2) that served to provide better care for individuals, better health for populations, and/or reduce per capita cost. Achievements should focus on significant impacts to beneficiary outcomes. Whenever possible, the summary should describe the achievement or innovation in quantifiable terms (e.g., number of impacted beneficiaries).			N/A - No achievements were received in this quarter.

\*The state should remove all example text from the table prior to submission.