State	*Ohio*
Demonstration name	*Group VIII Work Requirement and Community Engagement 1115 Demonstration Waiver*
Approval date	*March 15, 2019*
Approval period	*March 15, 2019 – February 29, 2024*
Implementation date	*January 1, 2021*
Demonstration Year	*Demonstration Year 1: March 15, 2019 – February 29, 2020*
Reporting Period	*Waiver Quarter 3*

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Ohio Group VIII Work Requirement and Community Engagement
Demonstration Year 1: March 15, 2019 – February 29, 2020
Waiver Quarter 3
Submitted on September 11, 2020

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 third Quarterly Monitoring Report provides a general operational status regarding implementation rather than reporting on the components described in special terms and conditions (STC) 35. It is important to note that this report is limited to activities that occurred during this reporting period. Rather than repeating specific activities previously reported, the information included in the third Quarterly Monitoring Report reflects new information to the greatest extent possible regarding planned activities and milestones achieved (e.g., specific components of the communication plan that were described in the second Quarterly Monitoring Report have been omitted here).

The third Quarterly Monitoring Report uses the same format as previous reports and organizes information in the following subsections: Program Design, Implementation Plan, Communication Strategy, Evaluation Design, System Requirements, Monitoring Protocol, Outstanding Issues, and Challenges and Barriers. ODM remains committed to transparency and oversight. Staff 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 communicate regularly with key stakeholders, such as the Ohio Department of Job and Family Services (ODJFS), to ensure issues are addressed. Process flows continue to be finalized as design features are fine-tuned.

Implementation Plan

The draft Implementation Plan was submitted to CMS on October 11, 2019.

Communication Strategy

ODM described several of the key components of its broad Communication Plan in the second Quarterly Monitoring Report (e.g., plans for website updates, member communication via mail, beneficiary notices, etc.). ODM continues to work with internal and external partners to refine and improve the activities described in its Communication Plan.

The second Quarterly Monitoring Report also described the following specific beneficiary communication activities prior to implementation, which will continue to occur through the noted date:

- Beneficiaries will receive updates regarding the Requirement via a combination of the agency's website, social media, and direct email and postal notices beginning six months prior to the implementation date.

- Existing beneficiaries will receive mailed notices regarding general Requirement policies through the month prior to implementation.

Evaluation Design

The draft Evaluation Design was submitted to CMS on October 8, 2019. On December 9, 2019, CMS provided feedback to ODM regarding the draft Evaluation Design. ODM is working to incorporate the CMS feedback into the Evaluation Design and plans to resubmit the draft to CMS during the next quarter of Demonstration Year 1 for final approval.

System Requirements

System requirements broadly describe the updates needed in the state's information technology (IT) systems to support implementation of the Requirement. The goal of system requirements work is to have all IT systems and system outputs (e.g., beneficiary compliance determinations, notices of action, etc.) developed and thoroughly tested prior to implementation. The plan for implementing system changes broadly follows a formal system requirement process that informs the system design that is then used to direct system development.

System design sessions, which began in October 2019 and are expected to conclude during the week of January 20, 2020, have supported development of system design documents that will be used as the basis for system development. Design sessions included the cross-functional and cross-agency resources who participated in the requirements gathering sessions. In addition to designing the systems to support the Requirement, the design sessions included development of complementary outputs such as notices of action (NOAs), forms, and reports.

The following IT systems were the focus of the requirements phase and will continue to be discussed during the design phase, which is scheduled to begin in mid-February.

- **Ohio Benefits**

    Ohio Benefits is a state system that ODM uses to determine and manage Medicaid eligibility. Design sessions are expected to conclude during the week of January 20, 2020. Development sessions are projected to begin in mid-February and focus on developing functional design documents and coding work needed to update IT systems.

- **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.

- **Interactive Voice Response (IVR)**

    ODM has identified a list of enhancements to its IVR system to support beneficiary questions and compliance with the Requirement. A few of these enhancements include the following:

    o New Requirement-specific phone queue available to beneficiaries and county JFS workers.

- o   Audio signature will be established for appraisal and acknowledgement forms.

- o   Requirement-specific call reporting statistics.

- o   Messaging capabilities (voice and SMS) to beneficiaries to provide reminders regarding Requirement forms due and those received.

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

    EDMS is an existing system that houses beneficiary forms and scanned documents for Medicaid. ODM has determined the list of system requirements needed to accommodate forms associated with the Requirement and to add taxonomy to scanned documents to identify Requirement forms specifically.

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

    The following Requirement-specific updates will be made to MITS:

    - o   The MITS Eligibility Update (330) interface will be modified to edit, accept, and store information from Ohio Benefits regarding beneficiary Requirement status.

    - o   MITS panels will be modified to display beneficiary information related to the Requirement.

    - o   The MITS Provider Portal will be modified to display beneficiary information related to the Requirement.

    - o   MITS transactions (e.g., 834C, 834F, 270/271) will be modified to contain information related to the Requirement.

    - o   MITS will be modified to interact with other systems (e.g., Ohio Benefits, Enterprise Data Warehouse) so that relevant information can be shared (e.g., information regarding automatic exemptions from the Requirement because of medical information or eligibility status, etc.).

- **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.

Monitoring Protocol

ODM received an extension from CMS to submit its draft Monitoring Protocol. The new due date was April 10, 2020. 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. Relevant information related to these decisions will be described in the Monitoring Protocol draft as appropriate.

Outstanding Issues

ODM has started program design for implementation, but there are a few design features that have yet to be developed or finalized. The following is a list of some of these design features (also listed in the first and second Quarterly Monitoring Reports), the development status of which will be reported in future Monitoring Reports[1]:

- Policies and procedures
- Outreach and education materials
- Training materials

Challenges and Barriers

There are several challenges and barriers described in the first and second Quarterly Monitoring Reports that 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: 1) availability of sufficient and reliable transportation to and from Requirement activities; 2) adequate communication to beneficiaries and providers about program design, requirements, and supports; and 3) 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.

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[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.