

<b>State</b>	<i>Ohio</i>
<b>Demonstration name</b>	<i>Group VIII Work Requirement and Community Engagement 1115 Demonstration Waiver</i>
<b>Approval date</b>	<i>March 15, 2019</i>
<b>Approval period</b>	<i>March 15, 2019 – February 29, 2024</i>
<b>Implementation date</b>	<i>January 1, 2021 (Temporarily delayed due to the Families First Coronavirus Response Act [FFCRA] maintenance of effort [MOE] requirement)</i>
<b>Demonstration year</b>	<i>Demonstration Year 2: March 1, 2020 – February 28, 2021</i>
<b>Reporting period</b>	<i>Waiver Quarter 3: September 1, 2020 – November 30, 2020</i>

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## Executive Summary

Following approval of Ohio's *Group VIII Work Requirement and Community Engagement Demonstration* (the Demonstration) on March 15, 2019, the Ohio Department of Medicaid (ODM) developed and began implementing a comprehensive strategy to prepare for go-live on January 1, 2021. With the extension of the Coronavirus 19 (COVID-19) public health emergency (PHE), go-live has been temporarily delayed to the first day of the month following the quarter in which the PHE ends. 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.

Like previous Quarterly Monitoring reports, the DY2 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 restating specific activities previously reported, the information included in the DY2 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 previous Quarterly Monitoring Reports have been omitted here).

The DY2 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 and will continue to work with the Centers for Medicare & Medicaid Services (CMS) to summarize appropriate and relevant information in this and future monitoring reports.

## Implementation Plan

The draft Implementation Plan was submitted to CMS on October 11, 2019, and CMS returned feedback to ODM on February 19, 2020. ODM continues to modify the Implementation Plan for resubmission and incorporation into the STCs.

## Communication Strategy

ODM described several of the key components of its broad Communication Plan in previous Quarterly Monitoring Reports (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. Due to COVID-19 impacts, ODM has decided not to procure a communication vendor at this time and will utilize internal agency and current vendor support for communications.

## Evaluation Design

A final revised draft Evaluation Design was submitted to CMS on July 28, 2020. Once approved by CMS, ODM will post for publication on the state's website within 30 days of CMS's approval of the final version.

The following evaluation activities were completed between September 2020 and November 2020:

- The evaluator collected and evaluated vendor proposals for the future evaluation survey fielding and RTI was selected to be the survey vendor.
- The Iteration One results and methods document was prepared and submitted to ODM for review.
- The Iteration Two monthly fielding and qualitative interviews are ongoing; development of the instrument for spring 2021 fielding has begun.

## System Development

The ODM plan for implementing system specifications broadly follows a requirements, design, development, testing, and implementation process.

System development broadly describes the building of the system updates needed in the state's information technology (IT) systems to support implementation of the Requirement. The goal of system development work is to have all IT systems and system outputs (e.g., beneficiary compliance determinations, Notices of Action [NOAs], etc.) developed and thoroughly tested at least six weeks prior to go-live.

The following IT systems are the focus of the requirements phase and will continue to be discussed during the design phase, which began in mid-February 2020.

- **Ohio Benefits**
  - Ohio Benefits is the state's eligibility determination system. Design sessions began July 9, 2019 and were completed on January 21, 2020. Development began in mid-February 2020 and focused on developing functional design documents and coding work needed to update IT systems.
  - The system build is approximately 95% complete and is on track to be completed by implementation. There have been delays with the hardware technology refresh, which needs to be completed prior to implementation. The Ohio Department of Administrative Services (DAS) is in the process of finalizing hardware refresh dates.
- **OhioMeansJobs**
  - OhioMeansJobs is a website that county Job and Family Services (JFS) workers currently use for the state's existing Supplemental Nutrition Assistance Program (SNAP) work requirement. Inclusion of the Medicaid Requirement will be considered in planned work on the site's redesign.
- **Interactive Voice Response (IVR)**
  - ODM has finalized the IVR requirements and is in the development stage.
- **Enterprise Document Management System (EDMS)**
  - ODM has finalized the EDMS system requirements and is in the development stage.
- **Medicaid Information Technology System (MITS)**
  - ODM has finalized the MITS system requirements and is in the development stage.
- **Enterprise Data Warehouse (EDW)**
  - ODM has finalized the EDW system requirements and is in the development stage.

## Monitoring Protocol

CMS has acknowledged that the Implementation Plan, which is still under development, must be finalized before the Monitoring Protocol can be completed. Accordingly, ODM received an extension from CMS to submit the draft Monitoring Protocol. 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, and a few design features have yet to be developed or finalized. The following is a list of some of these design features (also listed in previous DY2 Quarterly Monitoring Reports), the development status of which will be reported in future Monitoring Reports<sup>1</sup>:

- Policies and procedures
- Outreach and education materials
- Training materials
- Self-appraisal form
- Beneficiary notices

## Challenges and Barriers

There are several challenges and barriers described in previous DY2 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 develop proactive 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 regarding additional work for already stretched county JFS caseworkers. Based on conversations with the Ohio Department of Job and Family Services, these concerns remain. ODM will closely monitor these and other potential barriers.

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<sup>1</sup> This is not intended to be an exhaustive list; rather, the list captures the features that are more critical to implementation.

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The challenges and barriers noted above are further complicated by the COVID-19 pandemic. On October 2, 2020, the Secretary of Health and Human Services renewed the public health emergency for another 90-day period, effective October 23, 2020. Due to the maintenance of effort requirement identified in section 6008(b)(1) of the Families First Coronavirus Response Act (FFCRA), ODM is unable to implement the Requirement until the first day of the month following the quarter in which the public health emergency ends. Additionally, on September 8, 2020, due to high unemployment rates resulting from the COVID-19 pandemic, the Ohio Department of Job and Family Services (ODJFS) issued a Family Assistance Letter (FAL) which waived the able-bodied adults without dependents (ABAWDs) work participation requirement for all 88 counties in Ohio for federal fiscal year 2021. Because of the statewide ABAWD waiver, if the Requirement is implemented in federal fiscal year 2021, the entire Group VIII population will be exempt from the Requirement.

ODM will continue monitoring the impact of COVID-19 on program go-live.