

Oregon Project Independence –
Medicaid (OPI-M)

Section 1115 Quarterly Monitoring Report



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OPI-M Quarterly Monitoring Report

Introduction

On February 13, 2024, the Centers for Medicare and Medicaid Services (CMS) approved Oregon's request for a Section 1115 Medicaid demonstration, entitled "Oregon Project Independence-Medicaid (OPI-M)". The demonstration is to provide services to individuals ages 18 and older who are older adults or adults with physical disabilities with assessed needs in Activities of Daily Living. The demonstration also provides supports to unpaid caregivers to help meet beneficiaries' assessed needs while sustaining the caregivers' ability to meet those needs.

Demonstration Quarter Focus

This quarterly report is an overview of the activities from February 1, 2025, through April 30, 2025, the first quarter of the second year of the demonstration. It includes information about implementation, operational activities, and demonstration deliverables. The demonstration website is maintained as required in the Standard Terms and Conditions (STCs) and can be found under Additional Resources, Enclosures, and Attachments.

Key Accomplishments of the Quarter

Aging and People with Disabilities (APD) spent the first quarter of the second demonstration year continuing to focus on staff training, OPI-M implementation, and IT system upgrades in preparation for the program's public launch on March 1, 2025.

Operational needs

During the first quarter, APD continued to work on its implementation plans for OPI-M and launched the program publicly on March 1, 2025. Throughout implementation, APD elicited feedback from community partners and staff regarding OPI-M operational needs and focused on the public launch of the program. This included a bi-weekly OPI-M workgroup with impacted staff and weekly Question and Answer meetings for staff. APD also met in-person with Area Agency on Aging (AAA) partners to discuss OPI-M. In addition, a presentation on OPI-M was held for Tribal Navigators, members, and advocates at an in-person conference.

Staff readiness and training

Live in-person trainings that began last quarter continued across the state this quarter until every APD district completed them prior to the program's public launch. In addition to the in-person trainings for APD, a live virtual training was held for support staff across the state to ensure OPI-M is included in program consultation. The same program consultation live virtual training was held for APD lead workers and supervisors across the state. Another live virtual financial eligibility training was offered to staff. The previously developed trainings were and continue to be available to all staff who engage with individuals

interested in OPI-M or who are currently receiving services through APD or AAA. This includes, but is not limited to, case managers, eligibility workers, Aging and Disability Resource Connection (ADRC) staff, and support staff.

- (12) Live In-Person Training: OPI-M Service Case Management
- (2) Live Virtual Training: OPI-M Program Consultation
- (1) Live Virtual Training: OPI-M Financial Eligibility

Preparation of demonstration deliverables

In preparation for demonstration deliverables due throughout the quarter, APD worked with the Oregon Department of Human Services (ODHS) Office of Program Integrity, Quality Assurance (QA) Waiver Team on the HCBS Quality Improvement Strategy. APD also coordinated with the QA Waiver Team and Adult Protective Services on the HCBS Performance Measures. For the Quarterly Monitoring Report, the OPI-M Team worked together to prepare the report, receiving feedback from Oregon Health Authority (OHA). For the Quarterly Budget Neutrality Report, APD collaborated with the Office of Financial Services.

Post-Award Public Forums

Not applicable for this reporting quarter. The next OPI-M Post-Award Public Forum will be held on August 4, 2025.

Upcoming Activities

The following are upcoming activities.

- May 2025: Submit Annual Monitoring Report
- May 2025: Submit Annual Budget Neutrality Report
- July 2025: OPI-M Quality Assurance Reviews begin
- July 2025: Submit Quarterly Monitoring Report
- July 2025: Submit Quarterly Budget Neutrality Report
- July 2025: Submit HCBS Deficiency, Remediation and A/N/E Incident Report

Quarterly Expenditures

APD continued to collect actual expenditure information for the first quarter of the second demonstration year. Due to the need to receive the Federal Fiscal Year (FFY)25 Quarter 3 expenditure data that overlaps with the Demonstration Year (DY) Quarter 1, APD is requesting a September 8, 2025, deliverable due date.

Overall Demonstration Development/Issues

The following is the first quarter of the second demonstration year development and issues.

Operational/policy issues

During this quarter, APD shifted its focus toward enhancing MMIS and Oregon ACCESS systems to reduce the need for manual workarounds. Planning efforts were completed to update Oregon ACCESS to allow for 24-month benefit plan approvals, addressing a key gap that previously required manual intervention. Implementation of these system updates will be reported on in the next quarter. In addition, APD initiated work on identifying long-term solutions to streamline OPI-M and MMIS benefit plan creation processes, aiming to further minimize manual workload and improve system efficiency.

Last quarter, APD explored solutions for conducting outreach to individuals on the OPI-M interest list who had expressed interest prior to the program's public launch but were not included in the initial implementation phases. Staff capacity concerns were raised about reaching over 2,000 individuals while simultaneously managing local implementation efforts. To address this, APD developed a phased mailing approach using an interest list letter.

This quarter, following the closure of the interest list on February 28, 2025, four batches of letters were mailed starting in February 2025, with two-week intervals between each mailing. These batches covered individuals added to the interest list between July 1, 2024, and December 31, 2024. Two additional batches were mailed to individuals added between January 1, 2025, and February 28, 2025, with the final mailing complete in April 2025. This phased approach significantly reduced the workload for local offices, helping them manage OPI-M implementation demands while avoiding the need for manual outreach to nearly 3,000 individuals.

Financial/budget neutrality development/issues

For financial/budget neutrality development and issues, APD and OHA previously identified that the quarterly reporting on the CMS-64 (Federal Fiscal Year (FFY) quarters) is not the same duration as the demonstration quarters, which start a month after the FFY quarters. APD and OHA intend to staff with CMS. The next Budget Neutrality Monitoring Tool is to be submitted with a requested revised deliverable date of September 8, 2025.

Consumer issues

This quarter, APD identified consumer issues related to OPI-M notice requirements and screening processes across Medicaid programs. In response, APD collaborated with the hearings department to clarify notice requirement guidance for staff and conducted program consultation trainings to ensure OPI-M is consistently included as a service option for all applicants. Additionally, APD recognized that some local offices were struggling to manage the volume of OPI-M intakes and meet required timelines. To address this, APD began meeting with offices to discuss challenges and brainstorm potential workload solutions.

During the last quarter, consumers continued to express concern about the lack of access to non-emergency medical transportation under OPI-M. One possible solution identified involves using Older Americans Act Title IIIB Supportive Services funding. However, this resource is not available statewide. In response, APD submitted a formal proposal to CMS in March 2025, clarifying that the original intent of

“community transportation” within the OPI-M Special Terms and Conditions (STCs) included routine medical transportation for individuals without other options. The proposal recommends aligning OPI-M with the state-funded OPI program by allowing non-emergency medical transportation under specific conditions. Specifically, individuals must demonstrate limited transportation supports or an inability to use public options. This approach would ensure continued access to essential healthcare while maintaining program consistency and resource efficiency. Further updates will be provided in the next quarterly report.

Quality assurance/monitoring activity

APD began discussions with the Quality Assurance Review Team in February 2025 to plan the inclusion of OPI-M in statewide QA reviews. Further details will be shared next quarter.

Demonstration evaluation

Following CMS approval of the Evaluation Design in February 2025, OHSU began implementing their evaluation plan, including staff interviews on early implementation. Interviews with APD, AAA staff, and community partners started this quarter and will continue into the next.

Additional Resources, Enclosures, and Attachments

The following provide information on additional resources applicable to the first quarter of the second demonstration year.

Budget Neutrality

The Quarterly Budget Neutrality Report for DY2 Q1 will be uploaded into the PMDA system no later than September 8, 2025.

Demonstration website

The demonstration website can be found at <https://www.oregon.gov/odhs/providers-partners/seniors-disabilities/Pages/1115-demonstration-waiver.aspx>.

You can get this document in other languages, large print, braille, or a format you prefer free of charge. Contact the Office of Aging and People with Disabilities by email at APD.Communications@odhs.oregon.gov. We accept all relay calls, or you can dial 711.