

1. Title page for the state’s eligibility and coverage demonstration or eligibility and coverage policy components of the broader demonstration

The state should complete this title page at the beginning of a demonstration and submit as the title page of all monitoring reports. The content of this transmittal table should stay consistent over time.

This template only includes community engagement policy. Templates for other eligibility and coverage policies are forthcoming.

| | |
|--|-----------------------------------|
| State | South Carolina |
| Demonstration name | Palmetto Pathways to Independence |
| Approval date for demonstration | 12/12/2019 |
| Approval period for community engagement | 12/12/2019-11/30/2024 |
| Approval date for community engagement, if different from above | |
| Implementation date for community engagement | 1/1/2022 |

PRA Disclosure Statement - This information is being collected to assist the Centers for Medicare & Medicaid Services in program monitoring of Medicaid Section 1115 Eligibility and Coverage Demonstrations. This mandatory information collection (42 CFR § 431.428) will be used to support more efficient, timely and accurate review of states’ eligibility and coverage 1115 demonstrations monitoring reports submissions to support consistency of monitoring and evaluation of Medicaid Section 1115 Eligibility and Coverage Demonstrations, increase in reporting accuracy, and reduce timeframes required for monitoring and evaluation. Under the Privacy Act of 1974 any personally identifying information obtained will be kept private to the extent of the law. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget (OMB) control number. The OMB control number for this project is 0938-1148 (CMS-10398 # 58). Public

burden for all of the collection of information requirements under this control number is estimated to take about 8 hours per response. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to CMS, 7500 Security Boulevard, Attn: Paperwork Reduction Act Reports Clearance Officer, Mail Stop C4-26-05, Baltimore, Maryland 21244-1850.

2. Executive summary

This report provides details on activities completed by the South Carolina Department of Health and Human Services (SCDHHS) in support of the implementation of the Healthy Connections Community Engagement Initiative during demonstration year 2, quarter 1 (December 2020 – February 2021). SCDHHS continued its documentation and planning efforts. The agency also hosted the second meeting of the State Community Engagement Implementation Task Force on Dec. 17, 2020. During the meeting, updates on the community engagement initiative and expectations of task force members were presented. SCDHHS collaborated with an independent evaluation team at the University of South Carolina Institute for Families and Society to draft an implementation plan. The evaluation plan draft was submitted to CMS on Dec. 31, 2020.

3. Narrative information on implementation, by eligibility and coverage policy

This template only includes community engagement policies.

| Prompts | Demonstration year (DY) and quarter first reported | Metric(s) (if any) | State response |
|---|--|--------------------|----------------|
| CE.Mod_1. Specify community engagement policies | | | |
| CE.Mod_1.1 Metric trends | | | |
| <input checked="" type="checkbox"/> The state has no metrics related to this reporting topic. | | | |
| CE.Mod_1.2 Implementation update | | | |
| <input checked="" type="checkbox"/> The state has no implementation updates to report for this reporting topic. | | | |
| CE.Mod_2. Establish beneficiary supports and modifications | | | |
| CE.Mod_2.1 Metric trends | | | |
| <input checked="" type="checkbox"/> The state has no metrics related to this reporting topic. | | | |
| CE.Mod_2.2 Implementation update | | | |
| <input checked="" type="checkbox"/> The state has no implementation updates to report for this reporting topic. | | | |

| Prompts | Demonstration year (DY) and quarter first reported | Metric(s) (if any) | State response |
|--|--|--------------------|------------------------|
| CE.Mod_3. Establish procedures for enrollment, verification and reporting | | | |
| CE.Mod_3.1 Metric trends – <i>No metric trend analysis is required for this reporting topic.</i> | | | |
| CE.Mod_3.2 Implementation update | | | |
| <input checked="" type="checkbox"/> The state has no implementation updates to report for this reporting topic. | | | |
| CE.Mod_4. Operationalize strategies for noncompliance | | | |
| CE.Mod_4.1 Metric trends | | | |
| <input checked="" type="checkbox"/> The state has no metrics related to this reporting topic. | | | |
| CE.Mod_4.2 Implementation update | | | |
| <input checked="" type="checkbox"/> The state has no implementation updates to report for this reporting topic. | | | |
| CE.Mod_5. Develop comprehensive communications strategy | | | |
| CE.Mod_5.1 Metric trends - <i>No metric trend analysis is required for this reporting topic</i> | | | |
| CE.Mod_5.2 Implementation update | | | |
| 5.2.1 Compared to the demonstration design details outlined in the implementation plan, describe any change or expected changes to the state’s strategy to communicate with beneficiaries about: <ul style="list-style-type: none"> a) General CE policies b) Exempt populations and good cause circumstances c) Suspension or disenrollment for noncompliance d) Reactivation following suspension or reentry after disenrollment for noncompliance | | | No activity to report. |

| Prompts | Demonstration year (DY) and quarter first reported | Metric(s) (if any) | State response |
|---|--|--------------------|--|
| <p>5.2.2 Describe any outreach or education activities that were conducted with CE partners, such as qualified health plans, managed care organizations, providers, or community organizations, during this reporting period.</p> | <p>DY 1, Qtr. 1-3</p> | | <p>SCDHHS hosted the second meeting of the State Community Engagement Implementation Task Force on Dec. 17, 2020. During the meeting, updates on the community engagement initiative and expectations of task force members were presented.</p> <p>The task force, which is comprised of state agencies, has four committees that will provide the framework necessary to carry out specific implementation tasks. These committees will include task force members and other relevant stakeholders including community organizations, non-profit organizations and representatives from the managed care and provider communities. The four committees that were established are the data-sharing committee, community resources committee, eligibility coordination committee and outreach committee. Task force members were asked to review and provide any updates to their designated representatives.</p> |
| <p>5.2.3 Compared to the demonstration design details outlined in the implementation plan, describe any changes or challenges with how materials or communications were accessible to beneficiaries with limited English proficiency, low literacy, in rural areas, and other diverse groups.</p> | | | <p>No activity to report.</p> |
| <p>5.2.4 Compared to the demonstration design details outlined in the implementation plan, describe any changes or challenges with the state’s plan to communicate modifications of community engagement requirements to beneficiaries with disabilities.</p> | | | <p>No activity to report.</p> |

| Prompts | Demonstration year (DY) and quarter first reported | Metric(s) (if any) | State response |
|--|--|--------------------|---|
| 5.2.5 Describe any communication or outreach conducted to CE partner organizations during this reporting period. | DY 1, Qtrs. 1-3 | | <p>SCDHHS hosted a State Community Engagement Implementation Task Force meeting in December 2020 and conducted outreach with task force and committee members ahead of and after the meeting. This included distributing the presentation that was delivered during the task force meeting.</p> <p>Additionally, the agency conducted outreach to each task force organization to confirm committee members for each of the task force’s four committees.</p> |
| 5.2.6 Describe any internal staff training conducted during this reporting period. | DY 1, Qtr. 1-3 | | No activity to report. |
| CE.Mod_6. Establish continuous monitoring | | | |
| CE.Mod_6.1 Metric trends - <i>No metric trend analysis is required for this reporting topic</i> | | | |
| CE.Mod_6.2 Implementation update | | | |
| <input checked="" type="checkbox"/> The state has no implementation updates to report for this reporting topic. | | | |

| Prompts | Demonstration year (DY) and quarter first reported | Metric(s) (if any) | State response |
|--|--|--------------------|--|
| CE.Mod_7. Develop, modify, and maintain systems | | | |
| CE.Mod_7.1 Metric trends - <i>No metric trend analysis is required for this reporting topic</i> | | | |
| CE.Mod_7.2 Implementation update | | | |
| 7.2.1 Describe if the state has developed or enhanced its systems capabilities as described in the implementation plan for: <ul style="list-style-type: none"> a) Eligibility and enrollment system b) CE reporting for beneficiaries c) CE reporting for other CE entities d) Integration of data from other public programs, such as SNAP and TANF e) Suspension of benefits and payments and/or termination of eligibility f) Benefit reactivation and/or reenrollment once community engagement requirements are met g) Other significant systems changes and modifications | DY 1, Qtrs. 1-3 | | Business requirements documents were finalized and approved, which include additional eligibility questions for intake, additional requirements for access and integration with electronic data sources, and electronic notice and reporting capabilities for members and applicants. Staff continued working with the system integrator, IBM, on technical documentation and planning for the needed changes. |
| 7.2.2 Describe any additional systems modifications that the state is planning to implement. | DY 1, Qtrs. 1-3 | | None. |

4. Narrative information on implementation for any eligibility and coverage demonstration

| Prompts | Demonstration year (DY) and quarter first reported | Metric(s) (if any) | State response |
|--|--|--------------------|---|
| AD.Mod_1. Metrics and operations for demonstrations with any eligibility and coverage policies (report for all beneficiaries in the demonstration) | | | |
| AD.Mod_1.1. Metric trends | | | |
| <input checked="" type="checkbox"/> The state has no metrics trends to report for this reporting topic. | | | |
| AD.Mod_1.2. Implementation update | | | |
| 1.2.1 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, budget neutrality, 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 report template instructions for more detail. | DY 1, Qtrs. 1-3 | | <p>The FFCRA, which was signed into law on March 18, 2020, includes language that the agency believes would impact the implementation of the Healthy Connections Community Engagement Initiative. The provisions in the FFCRA, which the legislation orders to remain in place until the end of the current declared public health emergency related to COVID-19, prevent the implementation of the Healthy Connections Community Engagement Initiative. As a result of these provisions, SCDHHS’ ability to implement this initiative may be delayed.</p> <p>Additionally, the agency received two letters from CMS on Feb. 12, 2021, advising the agency that CMS was “commencing a process of determining whether to withdraw the authorities approved.” Rescinding the waivers CMS approved in December 2019 would also prevent SCDHHS from achieving its goal to promote better health outcomes and financial independence by providing access to resources to the most vulnerable South Carolinians while incentivizing able-bodied South Carolinians to achieve self-sustainability through this initiative.</p> <p><i>Note: SCDHHS responded to the Feb. 12 letters it received from CMS within the 30 days requested in both letters; however, the response date falls outside of the reporting period specified in this report.</i></p> |

5. Narrative information on other reporting topics

| Prompts | Measurement period first reported (MM/YYYY – MM/YYYY) | Metric(s) (if any) | State response |
|--|---|--------------------|---|
| 1. Financial/budget neutrality | | | |
| 1.1 Current status and analysis | | | |
| <input checked="" type="checkbox"/> The state has no metrics trends to report for this reporting topic. | | | |
| 1.2 Implementation update | | | |
| <input checked="" type="checkbox"/> The state has no implementation updates to report for this reporting topic. | | | |
| 2. Demonstration evaluation update | | | |
| 2.1 Narrative information | | | |
| 2.1.1 Provide updates on CE evaluation work and timeline. The appropriate content will depend on when this report is due to CMS and the timing for the demonstration. See report template instructions for more details. | 12/2019 – 8/2020 | | SCDHHS submitted a draft evaluation plan on Dec. 31, 2020. SCDHHS is awaiting CMS feedback on that plan before finalizing and implementing the associated activities. |
| 2.1.2 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. | 12/2019 – 8/2020 | | SCDHHS submitted a draft evaluation plan on Dec. 31, 2020. SCDHHS is awaiting CMS feedback on that plan before finalizing and implementing the associated activities. |

| Prompts | Measurement period first reported (MM/YYYY – MM/YYYY) | Metric(s) (if any) | State response |
|---|---|--------------------|---|
| 2.1.3 List anticipated evaluation-related deliverables related to this demonstration and their due dates. | 12/2019 – 8/2020 | | SCDHHS will submit a revised evaluation plan sixty days after receipt of CMS comments on the submitted evaluation plans. |
| 3. Other demonstration reporting | | | |
| 3.1 General reporting requirements | | | |
| 3.1.1 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. | 12/2019 – 8/2020 | | SCDHHS does not foresee any future changes needed. An implementation plan draft was submitted in demonstration year 1, quarter 1 (March 2020). Upon receiving feedback from CMS, SCDHHS may choose to make changes to the implementation. |
| 3.1.2 Compared to the details outlined in the STCs and the monitoring protocol, describe whether the state has formally requested any changes or whether the state expects to formally request any changes to: a) The schedule for completing and submitting monitoring reports b) The content or completeness of submitted reports and or future reports | 12/2019 – 8/2020 | | a) For DY 2, there are no requests for changing the schedule of the monitoring reports. SCDHHS is awaiting a revised monitoring template from CMS with metrics specific to our demonstration. b) There are no requested changes to the content or completeness of this report or future reports. |

| Prompts | Measurement period first reported (MM/YYYY – MM/YYYY) | Metric(s) (if any) | State response |
|--|---|--------------------|---|
| 3.1.3 Describe whether the state has identified any real or anticipated issues submitting timely post-approval demonstration deliverables, including a plan for remediation. | 12/2019 – 8/2020 | | No real or anticipated issues have been identified. |
| 3.2 Post-award public forum | | | |
| <input checked="" type="checkbox"/> There was not a post-award public forum held during this reporting period and this is not an annual report, so the state has no post award public forum update to report for this reporting topic. | | | |
| 4. Notable state achievements and/or innovations | | | |
| 4.1 Narrative information | | | |
| <input checked="" type="checkbox"/> The state has no notable achievements or innovations to report for this reporting topic. | | | |