

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

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Executive Summary

The information included in this report reflects major milestones and decisions made by the Ohio Department of Medicaid (ODM) during the first Demonstration Year (DY1) to prepare for implementation of the Work and Community Engagement Requirement (the Requirement) on January 1, 2021. The DY1 Annual Monitoring Report uses the same format as previous quarterly 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. The report also includes updates specific to the fourth quarter, where applicable. Notably, the fourth quarter updates are relatively minimal because of ODM priority shifts due to the COVID-19 pandemic.

Program Design

Since approval of Ohio's *Group VIII Work Requirement and Community Engagement Demonstration* (the Demonstration) on March 15, 2019, ODM has developed a comprehensive strategy to prepare for go-live on January 1, 2021. A work plan was developed to provide a roadmap for program development and implementation, which is regularly reviewed and updated based on ODM and CMS decisions and other issues that arise. As part of the work plan, ODM identified different roles and responsibilities for County Department of Job and Family Services (CDJFS) caseworkers. CDJFS caseworkers will play a key role in program operations, including conducting the beneficiary appraisal and serving as the main point of contact with Group VIII beneficiaries during the appraisal process.

Implementation Plan

The following describes the high-level activities and timeframes related to the Implementation Plan:

- **October 11, 2019:** ODM submitted the draft Implementation Plan to CMS.
- **February 19, 2020:** CMS provided feedback and questions regarding the draft Implementation Plan to ODM.
- **February 2020 – August 2020:** ODM will work with CMS to finalize the Implementation Plan.

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- ODM received CMS feedback and continues to revise the draft Implementation Plan to address CMS comments.

Communication Strategy

ODM developed a draft Communication Plan that identifies key stakeholders, both internal and external, and provides a roadmap for appropriate messaging, timing of messaging, and mode of delivery for each stakeholder. These communication activities are described in the draft Implementation Plan. The information summarized below, while not an exhaustive list, describes key communication activities described in the draft Implementation Plan that are also part of the overall communication strategy.

- A public-facing website will be used to communicate Requirement policies and implementation updates as well as other broad outreach activities that are specifically targeted to beneficiaries who have lost coverage.

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- ODM will ensure that information can reach rural areas and areas that may not have easy access to the internet, by sending communications by mail.
- In addition to information posted on the public-facing website, details regarding the Requirement will be shared via social media and direct communications channels as applicable. Any changes to the Requirement will be communicated to existing beneficiaries via notices.
- Beneficiary notices will be developed regarding Requirement policies on the following topics:
 - When the Requirement will commence
 - The number of required community engagement hours and frequency of completion
 - How to report compliance and at what frequency
 - Specific activities that may be used to satisfy the Requirement
 - The populations that are considered exempt
 - How to report a *good cause* exception and a list of *good cause* exceptions
 - Disenrollment for noncompliance
 - How to reapply for benefits after disenrollment
- ODM will hold quarterly roundtables and webinars as needed to share and gather feedback from partners regarding the Requirement.
- ODM will provide program overviews and frequently asked questions (FAQ) for internal staff regarding the Requirement, which may be utilized when responding to beneficiary questions. Copies of all notices and forms, recorded webinars, and the FAQ will be stored internally for staff to reference.
- ODM will provide pre-approved scripts for call center staff to ensure communication can be understood by all beneficiaries. Interpretation services will be available for beneficiaries with limited English proficiency. All notices and scripts will go through a formal approval process to ensure the information is easy to comprehend.
- ODM will develop training programs, which will include training for CDJFS caseworkers regarding the Requirement.
- ODM will provide call center training to ensure representatives understand the process and resources for beneficiaries regarding the Requirement. Call center training will include:
 - Requirement policies
 - Exemption and *good cause* exception reporting
 - Disenrollment for noncompliance
 - How to reapply for benefits after disenrollment

Evaluation Design

The following describes the high-level activities and timeframes related to the Evaluation Design:

- **October 8, 2019:** ODM submitted the first draft of its Evaluation Design to CMS.
- **December 9, 2019:** CMS provided feedback regarding the draft Evaluation Design to ODM.
- **February 8, 2020:** ODM incorporated CMS feedback and resubmitted the draft to CMS.
- **February 2020 – August 2020:** ODM will continue to work with CMS to refine its Evaluation Design, including COVID-related impacts on data collection.
- **August 4, 2020:** ODM will submit the final Evaluation Design to CMS.

Demonstration Year 1: Fourth Quarter Updates

- ODM received approval from CMS for a three-month extension to consider COVID-19 related impacts on how the Requirement will be evaluated.
- ODM will submit the final Evaluation Design to CMS on or before August 4, 2020.

System Requirements

The plan for implementing system requirements broadly follows a system requirement, then system design, then system development format. The goal of system requirements work is to have all IT systems and system outputs (e.g., beneficiary compliance determinations, Notices of Action [NOAs], etc.) developed and thoroughly tested by October 2020. This work to date has focused on the following systems:

- Ohio Benefits
- OhioMeansJobs
- Interactive Voice Response (IVR)
- Enterprise Document Management System (EDMS)
- Medicaid Information Technology System (MITS)
- Enterprise Data Warehouse (EDW)

The following describes the high-level activities and timeframes related to the system requirements:

- **May 2019 – August 2019:** ODM completed system requirement sessions, which included cross-functional and cross-agency resources to identify the system changes needed to support Demonstration activities.
- **October 2019 – January 2020:** ODM completed system design sessions, which included 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 system requirements sessions. In addition to designing systems to support the Requirement, the design sessions included development of complementary outputs such as NOAs, forms, and reports.
- **February 2020:** ODM began work on system development sessions which are planned for completion by October 2020.

Demonstration Year 1: Fourth Quarter Updates

- ODM implemented system development sessions, which are on track to be completed by October 2020.
- Notably, ODM has initiated a “hardware refresh” of the Ohio Benefits system.

Monitoring Protocol

ODM is in the process of drafting the Monitoring Protocol and has made decisions regarding collecting and reporting recommended monitoring metrics; however, completion of the Monitoring Protocol is dependent on CMS approval of the Implementation Plan, which is still under development. ODM has received CMS approval to submit the Monitoring Protocol after the Implementation Plan is finalized.

Outstanding Issues

ODM has started program design for implementation; however, there are design features that have yet to be developed or finalized. The following is a list of some of these outstanding design features¹:

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

Challenges and Barriers

One of the largest challenges/barriers that has emerged is the COVID-19 pandemic. The health and economic consequences in Ohio are potentially long-term and the full effects remain unknown. In April 2020, ODM identified an increase in Medicaid enrollment as a result of rising unemployment rates. Efforts are underway to determine the impact on Group VIII and develop a strategy to mitigate the effect on implementation. The availability of long-term employment opportunities and work supports may remain a significant barrier even after the public health emergency ends.

Additionally, the same challenges and barriers documented in the Quarterly Monitoring Reports remain and are potentially complicated by the COVID-19 pandemic. These challenges/barriers include: 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 overextended CDJFS caseworkers. Based on conversations with ODJFS, these concerns remain. ODM will closely monitor these and other potential barriers.

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.