



Operational Considerations for Work and Community Engagement Requirements

Medicaid and CHIP Payment and Access Commission

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Overview

- Background
- Status of waiver approvals and implementation
- Operational procedures states have set up for
 - Tracking compliance with the requirements
 - Outreach
 - Connections to supportive resources
- Ongoing monitoring

Background

- The Centers for Medicare & Medicaid Services (CMS) granted Section 1115 demonstration waivers to four states to adopt Medicaid work and community engagement requirements
 - AR, IN, NH
 - Approval for KY vacated
- Nine additional states have formally applied for similar waivers
 - AZ, KS, MI, ME, MS, OH, UT, SD, WI
- States and CMS view requirements as likely to increase employment, participation in job search and training, earned income

Status of Implementation

Arkansas

- Began June 1, 2018
- Phasing in requirements for individuals age 30 to 49 with incomes below 100 percent of the federal poverty level (FPL) based on renewal date

Kentucky

- Planned to phase in by county beginning July 1, 2018
- Approval vacated by U.S. District Court in June, remanded to CMS for further review; implementation on hold

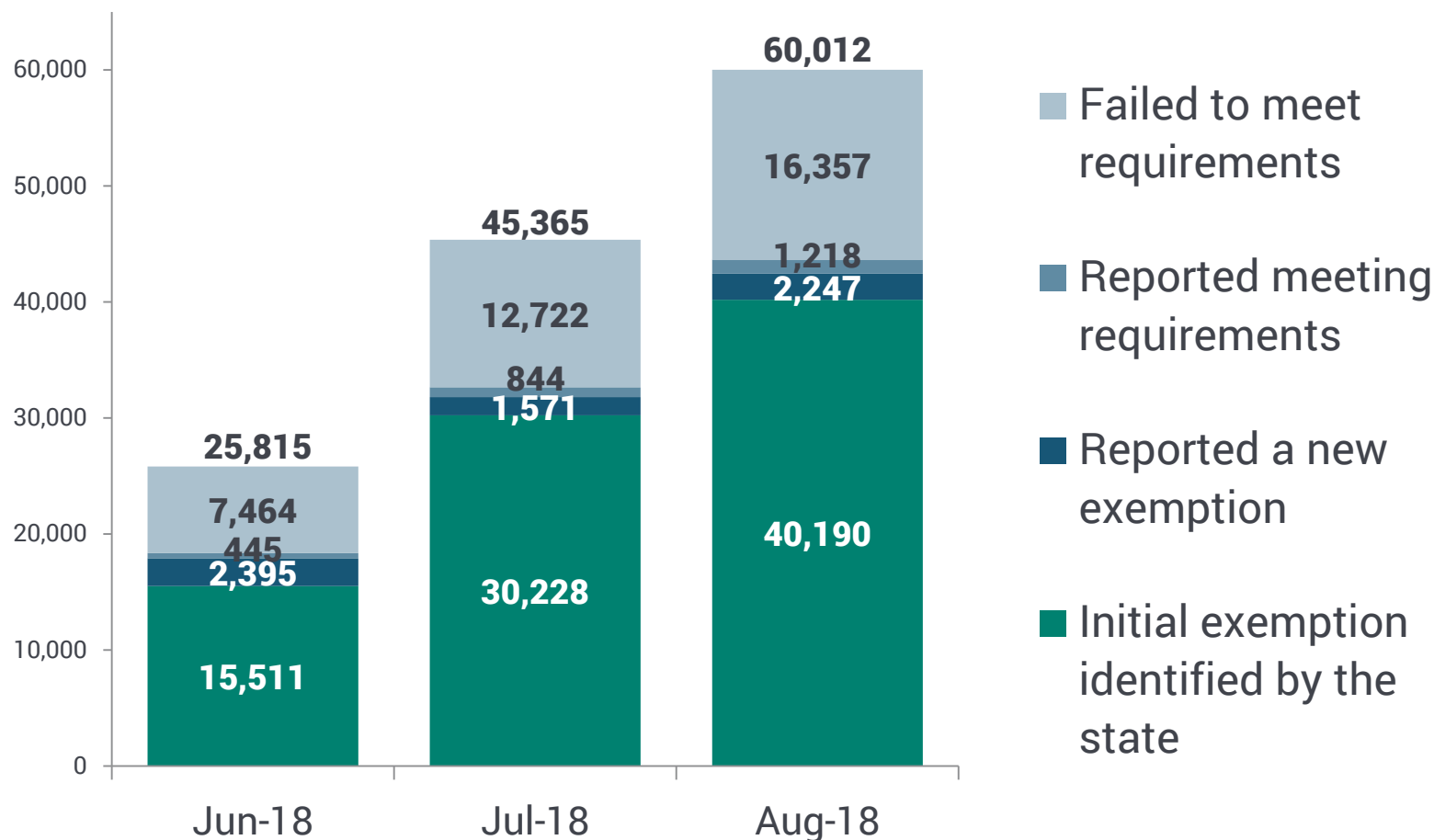
New Hampshire

- On track for statewide implementation January 1, 2019

Indiana

- On track for implementation January 1, 2019
- Required number of hours will gradually increase

Initial Data from Arkansas



Note: August figures include individuals subject to requirements in June and July and an expanded group of enrollees consistent with Arkansas' roll out plan

Source: Arkansas Department of Human Services

September 13, 2018

Initial Data from Arkansas - Continued

- 4,353 people non-compliant for three months, as of September 12; were disenrolled
- Will not be able to re-enroll until January 1, 2019 unless they
 - Apply for and receive a good-cause exemption
 - Become eligible for Medicaid through a different pathway

Tracking Compliance – Identifying Exempt Beneficiaries

- Administrative data sources
 - e.g., Income data, information about dependent children
 - Eligibility information from other programs, specifically Supplemental Nutrition Assistance Program (SNAP)
- Information from beneficiaries about new exemptions or those the state cannot independently identify

Tracking Compliance – Reporting and Verification

- Monthly reporting
 - Multiple means of submission (New Hampshire)
 - Through an online portal linked to the eligibility system (Arkansas, Kentucky)
 - Requires minimal staff intervention but enhancements to the eligibility system
 - Possible challenges to beneficiaries (e.g., lack of internet access, multistep process to create an account)
- Annual compliance review (Indiana)

Tracking Compliance – Enforcement

- Processes for suspending or terminating and, if applicable, reactivating eligibility
 - Suspensions occur in Indiana, Kentucky, New Hampshire; termination in Arkansas
- Capacity to suspend and resume payments to plans
- Ability to receive and process requests for good-cause exemptions
- Beneficiary protections
 - Appeal rights
 - Screening and enrollment requirements
 - Timely processing of applications

Outreach

Outreach to beneficiaries

- Required timely and adequate notices in writing with beneficiary-specific information
- Social media announcements, instructional videos, fact sheets, and toolkits in multiple languages
- Collaboration with health plans and external organizations

Broader stakeholder outreach

- Holding regular public stakeholder forums
- Engaging with employers and non-profit organizations

Connections to Supportive Resources

- Referrals to job training and job search assistance programs
 - Arkansas beneficiaries automatically referred to Department of Workforce Services for job training programs
 - Kentucky's regional workforce development boards help connect beneficiaries to job training and opportunities
 - Indiana Gateway to Work program
- Providing information on how to access other supportive resources

Quarterly and Annual Monitoring Requirements

- Required for all four states
- Must describe implementation progress, key challenges and achievements
- All states must propose metrics to include in reporting; CMS specified some for Arkansas and New Hampshire
 - Include number and percentage of individuals exempt, required to report, disenrolled or suspended, requested and received good-cause exemptions



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