

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

The state should complete this transmittal title page as a cover page when submitting its implementation plan.

State	<i>Enter state name.</i>
Demonstration name	<i>Enter full demonstration name as listed in the demonstration approval letter.</i>
Approval date	<i>Enter approval date of the demonstration as listed in the demonstration approval letter.</i>
Approval period	<i>Enter the entire approval period for the demonstration, including a start date and an end date.</i>
Implementation date	<i>Enter implementation date(s) for the demonstration.</i>

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 20 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. Required implementation information, by eligibility and coverage policy

Answer the following questions about implementation of the state’s eligibility and coverage demonstration. States should respond to each prompt listed in the tables. Note any actions that involve coordination or input from other organizations (government or non-government entities). Place “NA” in the summary cell if a prompt does not pertain to the state’s demonstration. Answers are meant to provide details beyond the information provided in the state’s special terms and conditions. Answers should be concise, but provide enough information to fully answer the question.

This template only includes CE policies.

Prompts	Summary
CE.Mod 1. Specify community engagement policies	
<i>Intent: To describe in more detail the CE policies outlined in the state’s STCs.</i>	
1.1 Describe how the state will define exempt populations, including additional details about how these exemptions are defined and how long exemptions will last if applicable: a) Full-time student status b) Medical frailty and other medical conditions c) Pregnancy d) Acute medical condition e) Former foster care youth	<i>a) Full-time student status</i> <i>Example: The state exempts full-time high school, college, and graduate students are exempt. The state defines full time student status for college and graduate students as a minimum of at least 12 credit hours per semester (or the equivalent) at an accredited institution of higher education. The state will use the Board of Education’s definition of full-time high school status, found in its reporting guidelines and procedures (link). College and graduate students must continue to meet these requirements to qualify for the CE exemption. High school students will remain exempt even if they do not meet these requirements during their summer break.</i>
	<i>b) Medical frailty and other medical conditions</i>
	<i>c) Pregnancy</i>
	<i>d) Acute medical condition</i>
	<i>e) Former foster care youth</i>

Prompts	Summary
f) Beneficiaries in substance use disorder treatment	<i>f) Beneficiaries in substance use disorder treatment</i>
g) Beneficiaries who are homeless	<i>g) Beneficiaries who are homeless</i>
h) Beneficiaries who were incarcerated within the last six months	<i>h) Beneficiaries who were incarcerated within the last six months</i>
i) Beneficiaries receiving unemployment benefits	<i>i) Beneficiaries receiving unemployment benefits</i>
j) Enrollment in the state’s Medicaid employer premium assistance program	<i>j) Enrollment in the state’s Medicaid employer premium assistance program</i>
k) Caregiver of a dependent	<i>k) Caregiver of a dependent</i>
l) Beneficiaries exempt from TANF/SNAP requirements	<i>l) Beneficiaries exempt from TANF/SNAP requirements</i>
m) Other (by specific exempt status)	<i>m) Other</i>
1.2 Provide additional details about qualifying community engagement activities and the number of required CE hours.	<i>a) Hour requirements</i>
a) Hour requirements	<i>Example: The state requires 80 hours per month of qualifying CE</i>
b) Extra hours policy	<i>b) Extra hours policy activities.</i>

Prompts	Summary
c) Grace period d) Reporting frequency and hours measurement	c) <i>Grace period</i>
	d) <i>Reporting frequency and hours measurement</i>
1.3 Provide additional details on how the state will: a) Define the circumstances that give rise to good cause b) Review additional circumstances that fall outside the defined list of circumstances c) Determine how long individual good cause circumstances will apply	a) <i>Define the circumstances that give rise to good cause</i> <i>Example: The state considers the following circumstances as meriting good cause: 1) the beneficiary has a disability as defined by the ADA, section 504 of the Rehabilitation Act, or section 1557 of the Patient Protection and Affordable Care Act and was unable to meet the requirement for reasons related to that disability; 2) the beneficiary has an immediate family member in the home with a disability under federal disability rights laws and was unable to meet the requirement for reasons related to the disability of that family member; 3) the beneficiary or an immediate family member who was living in the home with the beneficiary experiences a hospitalization or serious illness.</i>
	b) <i>Review additional circumstances</i>
	c) <i>How long individual good cause circumstances apply</i>
1.4 Provide additional details on how the state will define the following compliance actions: a) Opportunity to cure/grace periods b) Suspension	a) <i>Opportunity to cure/grace periods</i> <i>Example: The state will allow beneficiaries an opportunity to cure non-compliance. In the month immediately following the month in which a beneficiary has failed to meet the community engagement hours requirement, the beneficiary may cure non-compliance by completing 80 hours of community engagement activities in that calendar month. The opportunity to cure may be used once per calendar year.</i>
	b) <i>Suspension</i>

Prompts	Summary
c) Termination d) Non-eligibility period e) Other compliance actions	c) <i>Termination</i> d) <i>Non-eligibility period</i> e) <i>Other compliance actions</i>
CE.Mod 2. Establish beneficiary supports and modifications	
<i>Intent: To describe how states will provide supports to beneficiaries to ensure that they are able to meet CE requirements.</i>	
Specific supports	
2.1 Describe planned transportation supports and how the state will connect beneficiaries with those supports.	<i>Summary</i> <i>Example: The state Medicaid agency has developed a partnership with the state department of transportation to ensure that beneficiaries are aware of the state’s free public transportation program for low-income state residents. CE beneficiaries have been mailed notices about this program. All beneficiaries subject to CE requirements qualify for free or significantly reduced access to public transportation. Call center staff have also been trained to direct beneficiaries to these transportation supports.</i>
2.2 Describe planned child care supports and how the state will connect beneficiaries to those supports.	<i>Summary</i>
2.3 Describe planned language support services for non-English-speaking beneficiaries and how the state will connect beneficiaries with those supports.	<i>Summary</i>

Prompts	Summary
2.4 Describe if the state will provide or connect beneficiaries to any other supports, including assistance from other agencies and entities complementing Medicaid efforts.	<p><i>Summary</i></p> <p><i>Example: Managed care organizations in the state will provide CE supports, such as job and skills training, GED programs, and referrals to education and volunteering, that serve beneficiaries subject to the CE requirement.</i></p>
Ensure that CE activities are available and accessible	
2.5 Describe the state’s strategy for ensuring training opportunities, including job search training, on-the-job training, and job skills training, are available and accessible to beneficiaries.	<p><i>Summary</i></p>
2.6 Describe public programs that the state Medicaid agency will partner with to leverage existing employment and training supports. Describe how the arrangements will work, and indicate if these supports will be available to all demonstration beneficiaries subject to CE requirements or if other qualifying restrictions will apply. Describe how the state will fund such employment and training supports.	<p><i>Summary</i></p>
2.7 Describe how the state will modify community engagement requirements in areas with few CE opportunities and how often these adjustments will be reviewed.	<p><i>Summary</i></p>

Prompts	Summary
Reasonable modifications for individuals with disabilities (in compliance with all applicable federal laws, including the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, Section 1557 of the Affordable Care Act, Title VI of the Civil Rights Act, and the Age Discrimination Act)	
2.8 Describe the planned modifications to community engagement requirements available to beneficiaries with disabilities.	<i>Summary</i>
2.9 Describe the state’s process for assessing and providing modifications to community engagement requirements available to beneficiaries with disabilities.	<i>Summary</i>
2.10 Describe how the state will connect beneficiaries with disabilities to needed supports and services.	<i>Summary</i>
2.11 Describe any additional steps the state will take to ensure compliance with all applicable federal laws related to people with disabilities.	<i>Summary</i>
CE.Mod 3. Establish procedures for enrollment, verification, and reporting	
<i>Intent: To describe modifications to enrollment processes as well as verification and reporting of activities and exemptions.</i>	
Modifications to application, enrollment, and renewal procedures	
3.1 Describe any planned changes to the state’s application(s) and application/enrollment processes to identify beneficiaries subject to or exempt from CE requirements.	<i>Summary</i> <i>Example: The state intends to revise its single streamlined application to include questions about adults’ current work hours, Those not already working more than a specified hours/week that would exempt them from reporting will be provided a separate form post-enrollment to determine whether they meet other exemptions.</i>

Prompts	Summary
3.2 Describe any planned changes to the state’s renewal processes for the CE demonstration population. For example, will the state update any pre-populated renewal forms to capture information on CE compliance or exemptions?	<i>Summary</i>
3.3 Describe any other planned modifications to the state’s eligibility determination and enrollment processes and operations as a result of implementation of CE requirements. For example, will applications for beneficiaries who may be subject to CE be funneled to a specific unit for processing? Describe any impact that this may have on processing time for applications.	<i>Summary</i> <i>Example: The state is planning to revise its application and enrollment processes to incorporate community engagement eligibility requirements. All applications for beneficiaries who may be subject to CE will be funneled to a new unit for processing. These eligibility staff will be specifically trained on CE enrollment policies.</i>
Procedures for beneficiaries to report CE activities	
3.4 Describe how beneficiaries will report compliance with CE requirements. For example, what are the modalities to report hours and how frequently are beneficiaries required to report?	<i>Summary</i> <i>Example: Beneficiaries must report monthly hours online, in a state portal, by phone, or in person at a local office by the 5th day of the following month following compliance.</i>

Prompts	Summary
3.5 In states that allow online reporting, describe any reporting modifications available to beneficiaries without Internet access.	<i>Summary</i>
Procedures for CE entities to report CE activities	
3.6 Describe if the state plans to develop capacities so that employers, volunteer supervisors, schools, and other representatives can report CE activities on behalf of beneficiaries. Describe the procedures for CE entities to report CE activities.	<i>Summary</i>
Procedures for beneficiaries to report or file for an exemption	
3.7 <u>Describe the procedures</u> for beneficiaries to report standard exemptions as defined in section 1.1 (e.g., pregnancy, full time student status, homelessness) and what documentation is required, if any. Note whether specific exemptions must be reported differently.	<i>Summary</i>
3.8 <u>Describe the procedures</u> for beneficiaries to file for good cause as defined in section 1.3 and what documentation is required, if any.	<i>Summary</i>

Prompts	Summary
State verification of CE activities and exemptions	
3.9 Describe how the state will verify beneficiaries' compliance with CE requirements. For example, note whether the state will accept self-attestation of beneficiary-reported hours or verify hours through use of data from other sources. Specify how periodic audits will be conducted, if applicable.	<p><i>Summary</i></p> <p><i>Example: The state will accept beneficiaries' monthly attestation of reported hours unless the agency has information to indicate a discrepancy. On a quarterly basis, the agency will identify a random sample of 10 percent of beneficiaries subject to CE requirements and attempt to verify reported hours against state wage data, SNAP, TANF, and other data sources.</i></p>
3.10 Describe how the state will <u>verify exemptions</u> as defined in section 1.1, if applicable.	<p><i>Summary</i></p>
3.11 Describe if and how the state will use data from SNAP and TANF. Describe the process for identifying beneficiaries enrolled in SNAP/TANF and exempt from or meeting CE requirements for those programs. Describe how the state will ensure that those beneficiaries are also counted as meeting or exempt from Medicaid CE requirements, as applicable.	<p><i>Summary</i></p>

Prompts	Summary
3.12 Describe if and how the state will use additional data sources or leverage other entities to verify compliance with or identify potential exemptions from CE requirements (e.g., state wage data, unemployment, managed care organizations [MCO]).	<i>Summary</i>
CE.Mod_4. Operationalize strategies for noncompliance	
<i>Intent: To describe how states will implement the policies for beneficiaries who do not comply with CE requirements.</i>	
Strategies for beneficiaries at risk of noncompliance	
4.1 Describe how the state will identify beneficiaries at risk of noncompliance.	<i>Summary</i> <i>Example: The state has developed new functionality in its systems to automatically flag beneficiaries who are at risk of becoming non-compliant in the next month unless they report CE hours or apply for an exemption.</i>
4.2 Describe what strategies the state will use to assist beneficiaries at risk of noncompliance in meeting the requirements.	<i>Summary</i>
4.3 Describe how the state will implement the following compliance actions, including what processes the state will implement to identify and track beneficiaries in these statuses: a) Suspension b) Termination c) Non-eligibility period	<i>a) Suspension</i>
	<i>b) Termination</i>
	<i>c) Non-eligibility period</i>

Prompts	Summary
d) Other compliance actions (e.g., grace periods/ opportunity to cure)	<i>d) Other compliance actions</i>
4.4 Provide details on the state’s plan, if applicable, to provide advance notice to beneficiaries at risk of suspension or disenrollment for noncompliance. Include when the state will notify beneficiaries and how many notices or other communications (e.g., calls) each beneficiary will receive.	<i>Summary</i>
4.5 Describe the state’s process for benefit reactivation (from suspension) and/or re-enrollment (from termination) once community engagement requirements are met.	<i>Summary</i>
4.6 Describe the process by which a beneficiary who is about to be suspended or disenrolled will be screened for other Medicaid eligibility groups or exemptions (e.g., by sending form to potentially eligible beneficiaries to capture additional information).	<i>Summary</i>

Prompts	Summary
4.7 Describe any differences/modifications from the current renewal process, including changes for beneficiaries in suspension status due to noncompliance with CE requirements.	<i>Summary</i>
Stopping payments to managed care	
4.8 Describe procedures to stop capitation payment to MCOs when a beneficiary’s eligibility is suspended or terminated due to failure to comply with CE requirements.	<i>Summary</i>
4.9 Describe if and how beneficiaries will be made aware of ways to access primary and preventive care at low or no cost after disenrollment or during a suspension.	<i>Summary</i>
Re-enrollment after disenrollment for noncompliance	
4.10 Describe what beneficiaries will need to do to re-enroll following disenrollment or suspension for failure to comply with CE requirements.	<i>Summary</i>

Prompts	Summary
4.11 Describe how the state will process new applications for individuals who were disenrolled for non-compliance if it differs from the state’s standard application processes.	<i>Summary</i>
4.12 Describe how the state will handle applications for individuals who reapply for coverage but are still in suspended status or non-eligibility period, if applicable. For example, will the state process those applications with a prospective eligibility date or will the state deny those applications until individuals are eligible.	<i>Summary</i>
Appeals processes	
4.13 Describe any modifications to the appeals processes for beneficiaries enrolled in the CE demonstration, including appeals for: <ul style="list-style-type: none"> a) Suspensions or disenrollment for noncompliance; b) Denials of exemption or good cause requests Describe what happens to the beneficiary while the case is pending or in the appeals/fair hearing process, if it differs from the current process.	<i>Summary</i>

Prompts	Summary
CE.Mod 5. Develop comprehensive communications strategy	
<i>Intent: To describe how the state will communicate CE policies and procedures (as necessary) to internal and external stakeholders (beneficiaries, partners, staff/other internal entities).</i>	
Beneficiary communication	
<p>5.1 Provide details on the state’s plan to communicate to current beneficiaries and new applicants/beneficiaries about general CE policies, including when community engagement requirements will commence, the number of required community engagement hours and frequency of completion, how to report compliance and on what frequency, specific activities that may be used to satisfy community engagement requirements, and information about resources that will facilitate compliance such as the availability of transportation and child care. Include details such as how often the state plans to communicate with beneficiaries and through what modes of communication, including what information will be distributed using formal notices.</p>	<p><i>Summary</i></p> <p><i>Example:</i> <i>The state will provide beneficiaries with official notices about when CE requirements will commence, the number of required hours per week, how to report hours, specific activities that may be used to satisfy the requirements, and supports that are available to assist beneficiaries in meeting the requirements. These will be provided twice, 30 days and 15 days prior to the CE requirements going into effect. The Medicaid agency is also working with local community partners to host events in the community to provide information about general CE polices and answer questions. The Medicaid agency plans to hold at least one event in every county. Material about how to report hours has been distributed to local libraries and other community partners that have computers that beneficiaries can use to enter their hours into the online portal.</i></p>

Prompts	Summary
5.2 Provide details on the state’s plan to communicate to beneficiaries about exempt populations and good cause circumstances . Include details such as how often the state plans to communicate with beneficiaries and through what modes of communication, including what information will be distributed using formal notices.	<i>Summary</i>
5.3 Provide details on the state’s plan to communicate to beneficiaries about suspension or disenrollment for noncompliance . Include details such as how often the state plans to communicate with beneficiaries, through what modes of communication, including what information will be distributed using formal notices.	<i>Summary</i>

Prompts	Summary
<p>5.4 Provide details on the state’s plan to communicate to beneficiaries about reactivation following suspension or re-entry after disenrollment for noncompliance. Include details such as how often the state plans to communicate with beneficiaries, through what modes of communication, including what information will be distributed using formal notices.</p>	<p><i>Summary</i></p>
<p>5.5 Describe the state’s plan for communicating to beneficiaries about changes in requirements. For example, how will beneficiaries be notified of differences in the requirements they need to meet if they transition off SNAP/TANF but remain subject to community engagement requirements.</p>	<p><i>Summary</i></p>
<p>5.6 Describe any plans to use CE partners, such as qualified health plans, managed care organizations, providers, or community organizations to communicate to beneficiaries and conduct outreach, such as delivering education and ensuring compliance with CE requirements.</p>	<p><i>Summary</i></p>

Prompts	Summary
5.7 Describe how the state will ensure that materials or communications are accessible to beneficiaries with limited English proficiency, low literacy, in rural areas, and other diverse groups. Describe the process for testing beneficiary notices for reading level and comprehension.	<i>Summary</i>
5.8 Describe the state’s plans for translating beneficiary notices into languages other than English, and note what other languages will be available.	<i>Summary</i>
5.9 Describe the state’s plan to communicate modifications of community engagement requirements to beneficiaries with disabilities.	<i>Summary</i>
Partner communications	
5.10 Describe the state’s plan to conduct outreach to partner organizations.	<i>Summary</i>
5.11 Describe how the state plans to keep partner organizations informed and engaged, including all forms of communication that the state plans will use to engage partner organizations.	<i>Summary</i>

Medicaid Section 1115 Eligibility and Coverage Demonstration Implementation Plan
[State] [Demonstration Name]
[Demonstration Approval Date]
Submitted on [Insert Date]

Prompts	Summary
Staff/internal communications	
5.12 Describe internal staff trainings that the state is planning to conduct, such as trainings for call center representatives.	<i>Summary</i>
5.13 Describe any internal materials that the state is planning to develop for staff, such as manuals or reference guides.	<i>Summary</i>

Prompts	Summary
CE.Mod 6. Establish continuous monitoring	
<i>Intent: To describe the state's process for conducting process and quality improvement for the CE program.</i>	
<p>6.1 Describe any analyses that the state is planning to conduct to inform its monitoring beyond the CMS required quarterly and annual monitoring reports. Describe the state's process for determining whether changes are needed for the following:</p> <ul style="list-style-type: none"> a) Beneficiaries exempt from community engagement requirements b) Qualifying community engagement activities and required hours c) Reporting frequency and hours measurement d) Situations that give rise to good cause e) Compliance actions f) Other policy changes 	<p><i>Summary</i></p> <p><i>Example: The state is planning to conduct beneficiary phone surveys and track beneficiaries who are not reporting hours due to technical difficulties. If the state identifies a substantial number of beneficiaries are not reporting hours due to technical difficulties, the state will consider providing additional notices to beneficiaries and/or training CE partner entities who help beneficiaries enter hours into the state's online portal.</i></p>

Prompts	Summary
<p>6.2 Describe any actions needed to ensure that the state can capture and report required quarterly and annual monitoring metrics. Describe any necessary structural or process changes (i.e. data sharing systems/agreements with MCOs) that the state must make in order to capture and report required quarterly and annual monitoring metrics. IT changes need only be discussed in section 7.</p>	<p><i>Summary</i></p>
<p>6.3 Describe how the state will assess the availability of accessible transportation supports by region and how the state will address gaps in supports. Note the frequency with which the state will assess the availability of transit and transportation supports.</p>	<p><i>Summary</i></p>
<p>6.4 Describe how the state will assess the availability of child care supports by region and how it will address gaps in supports. Note the frequency with which the state will assess the availability of child care supports.</p>	<p><i>Summary</i></p>

Prompts	Summary
<p>6.5 Describe how the state will assess the availability of language access services by region and address gaps in supports. Note the frequency with which the state will assess the availability of language access services.</p>	<p><i>Summary</i></p>
<p>6.6 Describe how the state will assess the availability of other supports, including assistance from other agencies and entities complementing Medicaid efforts, by region and address gaps in supports. Note the frequency with which the state will assess the availability of other supports.</p>	<p><i>Summary</i></p>
<p>6.7 Describe how the state will assess whether qualifying community engagement activities are available during a range of times, through a variety of means, and throughout the year. Describe any additional analysis that the state is planning to conduct to verify the available community engagement opportunities.</p>	<p><i>Summary</i></p>

Prompts	Summary
6.8 Describe how the state will identify geographic areas with high unemployment and limited economic and/or educational opportunities. Describe how the state will adjust community engagement requirements in areas with few CE opportunities and how often those adjustments will be reviewed.	<i>Summary</i>
6.9 Describe how the state will assess reasonable modifications and the availability of supports for beneficiaries with disabilities by region. Describe how the state will address gaps in supports. Note the frequency with which the state will assess reasonable modifications and the availability of supports.	<i>Summary</i>
CE.Mod 7. Develop, modify, and maintain systems	
<i>Intent: To describe any system changes needed to implement CE policies and meet reporting requirements.</i>	
7.1 Describe whether the state is planning to enhance its eligibility and enrollment systems to determine eligibility for the CE demonstration population.	<i>Summary of planned changes or enhancements</i> <i>Example: The state plans to enhance current system capabilities to identify and tag beneficiaries in the system who must comply with and those who are already exempt from CE requirements. The state will establish data sharing agreements with SNAP/TANF and automate the system to flag exempt SNAP/TANF beneficiaries.</i>
7.2 Describe whether the state is planning to develop or enhance systems capacities so that beneficiaries can report CE hours.	<i>Summary of planned changes or enhancements</i>

Prompts	Summary
7.3 Describe whether the state is planning to develop or enhance systems capacities so that CE entities, such as employers, volunteer supervisors, schools, and other institutions, can automatically report CE activities completed by beneficiaries.	<i>Summary of planned changes or enhancements</i>
7.4 Describe whether the state is planning to develop or enhance systems capacities to integrate data from other public programs, such as SNAP and TANF.	<i>Summary of planned changes or enhancements</i>
7.5 Describe any systems modifications that the state is planning to operationalize the suspension of benefits and/or termination of eligibility. Describe any changes to the determination of eligibility, including changes to the MMIS eligibility module to show someone is in a suspended status.	<i>Summary of planned changes or enhancements</i>

Prompts	Summary
7.6 Describe any systems modifications that the state is planning to operationalize benefit reactivation and/or re-enrollment once community engagement requirements are met. Describe what changes states with non-eligibility periods will implement to prevent enrollment during these periods.	<i>Summary of planned changes or enhancements</i>
7.7 Describe any other significant systems modifications the state is planning to operationalize community engagement requirements.	<i>Summary of planned changes or enhancements</i>

Section 3: Relevant documents

Please provide any additional documentation or information that the state deems relevant to successful execution of the implementation plan. This information is not meant as a substitute for the information provided in response to the prompts outlined in Section 2. Instead, material submitted as attachments should support those responses.