BerryDunn

Independent Review

Workers' Compensation OnBase Case and Document Management Solution, with Migration to IAIABC EDI Claims 3.1 (Workers' Compensation Modernization Project)

Department of Labor

Submitted to the
State of Vermont, Agency of Digital Services
January 26, 2021

FINAL

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1. Executive Summary

For all Information Technology (IT) activities over $1,000,000, Vermont statute (or at the discretion of the Chief Information Officer [CIO]) requires an Independent Review by the Office of the CIO before the project can begin. The State of Vermont (State) Agency of Digital Services (ADS) engaged BerryDunn to perform an Independent Review of the previously bid Workers' Compensation (WC) OnBase Case and Document Management Solution, with Migration to International Association of Industrial Accident Boards and Commissions (IAIABC) Electronic Data Interchange (EDI) Claims 3.1 (Project). This Independent Review began on December 6, 2021, and the presentation of findings is tentatively planned for the week of January 10, 2022.

The Vermont Department of Labor (VDOL) is seeking to implement OnBase for case and document management to replace existing WC IT systems that are outdated, unsupported, and at risk of failure. The new system will automate manual, paper-based processes and provide a scalable, efficient way to digitize, store, and retrieve information. VDOL must also implement a claims processing solution—integrated with the case and document management solution—to migrate from IAIABC EDI Claims Version 1.0 to 3.1, which is the most recent standard that governs the submission of WC Injury Reports.

In April 2021, VDOL released a Request for Proposal (RFP) to establish contracts with one or more vendors to implement a solution that meets the requirements/needs listed above. VDOL received two responses to the portion of the RFP related to implementation of OnBase for case and document management, on the State's existing OnBase instance, and two responses to the portion of the RFP related to the in-tandem migration to IAIABC EDI Claims Version 3.1. The State's evaluation team has selected All Star Software Systems, LLC (All Star) for the OnBase portion of the RFP and Ebix, Inc. (Ebix) for the EDI portion of the RFP as its preferred vendors.

While conducting the Independent Review, BerryDunn identified nine risks, with seven risks being high impact and/or high likelihood of occurrence. These risks are listed in summary form in Section 1.3, and in detail in Attachment 2 – Risk Register.

1.1 Cost Summary

Table 1.1 includes a summary of the costs. More detail can be found in Section 5: Acquisition Cost Assessment and Section 10: Impact Analysis on Net Operating Costs.

Table 1.1: Cost Summary

IT Activity Life Cycle	Cost and Funding Source
Total Life Cycle Costs (Five Years)	$3,302,103.91
Total Implementation Costs	$1,828,194.91
New Annual Operating Costs (Four Years)	$1,473,936
Current Annual Operating Costs (Four Years)	$1,057,020
Difference Between Current and New Operating Costs	$416,916
Funding Source(s) and Percentage Breakdown of Multiple Sources	All costs to be paid from the Workers' Compensation Administration Fund

1.2 Disposition of Independent Review Deliverables

Table 1.2 includes a summary of the Independent Review findings as elaborated later in the report.

Table 1.2: Independent Review Deliverables

Deliverable	Highlights From the Independent Review Including Explanations of Any Significant Concerns
Acquisition Cost Assessment	The total acquisition cost is $1,828,194.91. Based on BerryDunn's experience working with other state government agencies during system planning, procurement, and implementation, we believe the State is paying comparable costs to similar solutions and implementation services in the market.
Technology Architecture and Standards Review	All Star will be responsible for the configuration and implementation of the OnBase case and document management system, while Ebix will be responsible for the implementation of its proposed Workers' Compensation Injury Reporting Service (WCIRS). WCIRS is a web-based, Software as a Service (SaaS) solution that will integrate with OnBase to support injury reporting. BerryDunn determined that OnBase and the WCIRS solution aligns with VDOL's goal to achieve government efficiency through innovations and complies with the principles enumerated in the current ADS Strategic Plan.

Deliverable	Highlights From the Independent Review Including Explanations of Any Significant Concerns
Implementation Plan Assessment	At the time of this Independent Review, the State was still in contract negotiations with All Star and Ebix, including finalizing an integrated implementation master schedule. All Star has provided a 17-month implementation timeline for OnBase, which will need to be discussed with Ebix so the WCIRS implementation schedule can be adjusted from what was originally proposed. BerryDunn has no concerns with the 17-month implementation timeline; however, in addition to the draft contracts not having enough detail to hold the vendors accountable for training (as described in Section 1.4: Other Key Issues), there are a number of risks outlined in Attachment 2 – Risk Register that might cause project schedule delays if not mitigated.
Cost-Benefit Analysis	OnBase is expected to help VDOL automate manual, paper-based processes and provide a scalable, efficient way to digitize, store, and retrieve information. Furthermore, the implementation of Ebix's WCIRS will allow VDOL to migrate to the most recent EDI standard that governs the submission of WC Injury Reports. BerryDunn and the State feel the benefits outweigh the cost for implementing the new solution for WC.
Analysis of Alternatives	During stakeholder interviews, the project team reported that VDOL explored potential alternatives through discussions with ADS leadership before issuing the RFP. BerryDunn believes that considering existing IT investments (e.g., Salesforce) and using the competitive bid and proposal evaluation process was a sound approach to understanding the State's options for implementing a solution to meet VDOL's business needs.
Impact Analysis on Net Operating Costs	The State will expend most one-time fees on professional services in Year 2 and 3, but will result in a cost decrease at Year 4 after the initial implementation. However, the costs do not break even with the annual licensing costs and vendor services for supporting and maintaining the new solution.
Security Assessment	The ADS Security Office reports it does not have any concerns with compliance to State and federal security requirements for the OnBase case and document management system or the WCIRS solution.

1.3 Risks Identified as High Impact and/or Having High Likelihood of Occurrence

Table 1.3 provides a summary of each risk, including risk probability, impact, and overall rating. A complete Risk Register is included in Attachment 2.

Table 1.3: Project Risk Summaries and Ratings

Risk ID	Risk Description	Risk Likelihood/ Probability	Risk Impact	Overall Risk Rating
1	All Star has not implemented a case management workflow module for any clients—only for its own instance that is used for internal business processes. The vendor's inexperience with implementing this module for a WC agency might lead to a longer than expected Project schedule and/or unexpected barriers/challenges.	High	High	High
2	The State does not have a planned Organizational Change Management (OCM) approach for addressing the following concerns: • Many staff members are at retirement age and might be resistant to learning a new system and processes. • Trading partners will experience a large change and learning curve in regards to the information they will need to report to VDOL (with the IAIABC EDI Claims upgrade from Version 1 to Version 3.1). • The primary champion for the Project, the WC Director, is retiring on 12/31/2021. This might lead to lack of adoption of the new solutions and slow/prevent achievement of Project goals/objectives.	High	High	High

Risk ID	Risk Description	Risk Likelihood/ Probability	Risk Impact	Overall Risk Rating
3	There is a current resource strain in regards to the Project's Enterprise Architect (EA) resource. State staff during stakeholder interviews said the EA has been unavailable at certain times when needed (due to other responsibilities) and that this might continue going forward. The lack of active engagement from the State's EA might lead to delays in the Project schedule as EAs are typically expected to review key deliverables and provide technical oversight throughout IT projects.	High	Medium	Medium
4	There does not appear to be clarity between the vendors and the State regarding the preferred tool and process expectations for requirements management and traceability. Absent a defined approach for requirements management and traceability, among two different solutions/vendors, might limit the State's visibility into whether or not the vendors' solutions have met the requirements, and might also lead to misaligned expectations regarding roles/responsibilities for requirements management and traceability.	Medium	High	Medium
5	There is only one State staff member (the vocational rehabilitation specialist) familiar with the EDI Solution/work and only one State staff member (the Certified System Administrator for OnBase) who will be engaged in development knowledge transfer with All Star (until a second Certified System Administrator for OnBase is on-boarded). If either of these resources become unavailable, for any reason, then there is no one to fill those roles for the State.	Medium	High	Medium

Risk ID	Risk Description	Risk Likelihood/ Probability	Risk Impact	Overall Risk Rating
7	The State Project Manager is currently allocated eight hours per week to the Project, and is responsible for developing/monitoring/maintaining an integrated master Project schedule that covers both of the vendors' efforts—in addition to the other responsibilities (e.g., risk/issue management). Eight hours per week might not be enough time to effectively perform these duties.	High	Medium	Medium
9	The State has identified certain data quality issues within the current WC solution and requires the State to complete data cleansing activities prior to the commencement of data migration and conversion activities. The Project might be delayed if the State does not complete this work, or flawed data will be migrated into the new solution and will need to be cleaned later in the new solution.	Low	High	Medium

1.4 Other Key Issues

BerryDunn determined through review of the draft contracts between the State and All Star/Ebix that the contracts—from BerryDunn's perspective—do not have enough detail to hold the vendors accountable for meeting the business needs in the area of training. BerryDunn believes the language that details the vendors' training effort requirements is too high-level to help ensure VDOL's business needs are met. There also appears to be no training deliverables, such as a training plan, that the vendors need to develop/deliver—which might later elaborate on the necessary details of the expected training efforts.

1.5 Recommendation

Based on this Independent Review, and assuming that the State executes the mitigation strategies as defined in Attachment 2, BerryDunn recommends that the State continue contract negotiations with All Star and Ebix.

1.6 Report Acceptance

Independent Reviewer Certification

I certify that this Independent Review Report is an independent and unbiased assessment of the proposed solution's acquisition costs, technical architecture, implementation plan, cost-benefit

analysis, and impact on net operating costs, based on the information made available to BerryDunn by the State.

1/24/2021

_____   _____
Independent Reviewer Signature   **Date**

1.7 Report Acceptance

The electronic signature below represents the acceptance of this document as the final completed Independent Review Report.

DocuSigned by:

John Quinn

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1/28/2022

_____   _____
State of Vermont Chief Information Officer   **Date**

2. Scope of This Independent Review

2.1. In Scope

The scope of this document is fulfilling the requirements of Vermont Statute, Title 3, Chapter 56, §3303(d).

The Independent Review Report includes:

- An acquisition cost assessment

- A technology architecture review and standards review

- An implementation plan assessment

- A cost analysis and model for benefit analysis

- An analysis of alternatives

- An impact analysis on net operating costs for the agency carrying out the activity

- A security assessment

This Independent Review used the following schedule:

- Week of December 6, 2021: Conduct a project planning meeting, develop a participation memo, schedule interviews, and review documentation

- Week of December 13, 2021: Conduct the first round of interviews and document initial findings, risks, and issues

- Week of December 20 and December 27, 2021: Conduct additional research and provide the preliminary Independent Review Report to the State

- Week of January 3, 2022: Collect feedback, update the Independent Review Report, and submit the proposed final draft Independent Review Report to the State

- Week of January 10, 2022 (tentative): Present the Independent Review Report to the CIO, complete any follow-up work and updates to the Independent Review Report, obtain CIO sign-off via the Oversight Project Manager on the Independent Review Report, and facilitate the closeout meeting

2.2. Out of Scope

No items from Vermont Statute, Title 3, Chapter 56, §3303(d) are out of scope for this Independent Review.

3. Sources of Information

3.1. Independent Review Participants

Table 3.1 includes a list of stakeholders who participated in fact-finding meetings and/or communications.

Table 3.1: Independent Review Participants

Name	Organization and Role	Participation Topic(s)
Trisha Watson	ADS Enterprise Project Management Office (EPMO) – Project Manager for Project	- General Project Information - WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan - Solution Acquisition Cost - Project Risk Assessment
Alex Ibey	ADS EPMO – Program Manager	- General Project Information - WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan - Solution Acquisition Cost - Project Risk Assessment
Rajesh Kumar	ADS EPMO – Business Analyst	- General Project Information - WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan - Solution Acquisition Cost - Project Risk Assessment
Karen Canas	ADS – VDOL IT Manager	- General Project Information - WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan - Technology Architecture and Standards Review - Solution Security Assessment - Project Risk Assessment

Name	Organization and Role	Participation Topic(s)
Patricia Ethier	ADS – VDOL Certified System Administrator for OnBase	• General Project Information • WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan • Technology Architecture and Standards Review • Solution Security Assessment • Project Risk Assessment
Kevin (Rudy) Pecor	ADS – Enterprise Architect	Did not attend meeting
Joseph Thetford	ADS – Information Security Analyst	• General Project Information • WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan • Technology Architecture and Standards Review • Solution Security Assessment • Project Risk Assessment
Shayne Garner	Ebix – Vice President, Project Oversight	• General Project Information • WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan • Technology Architecture and Standards Review • Solution Security Assessment • Project Risk Assessment
Kevin Nouland	Ebix – Business Analyst	• General Project Information • WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan • Technology Architecture and Standards Review • Solution Security Assessment • Project Risk Assessment

Name	Organization and Role	Participation Topic(s)
Karen Eaton	Ebix – Director of Development	• General Project Information • WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan • Technology Architecture and Standards Review • Solution Security Assessment • Project Risk Assessment
Tom Tirone	All Star – Director of Project Management and Design	• General Project Information • WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan • Project Risk Assessment
Dave Sagendorf	All Star – Head of Development	• General Project Information • WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan • Project Risk Assessment
Atonetta Angelino	All Star – Project Manager	• General Project Information • WC OnBase Case and Document Management Solution implementation plan and IAIABC EDI Claims 3.1 migration plan • Project Risk Assessment

3.2. Independent Review Documentation

Table 3.2 below includes a list of the documentation utilized to compile this Independent Review Report.

Table 3.2: Independent Review Documentation

Document Name	Description	Source
IT Activity and Business Case (ABC) Cost Breakdown	A high-level breakdown of the Project's expenses by category	Here
IT ABC Form	Project cost information collected from the draft contracts with All Star and Ebix	Here

Document Name	Description	Source
Deliverable Cost Comparison Chart	VDOL's financial analysis of proposal options based on process provided by bidders	Here
VDOL All Star Justification Memo	VDOL's explanation for selecting All Star as the agency's OnBase Solution provider	Here
VDOL Ebix Justification Memo	VDOL's explanation for selecting Ebix as the agency's EDI Solution provider	Here
Ebix Proposal and Related Attachments	Ebix's response to the portion of the RFP related to the in-tandem migration to IAIABC EDI claims 3.1	Here
All Star Proposal and Related Attachments	All Star's response to the portion of the RFP related to implementation of OnBase case and document management for WC on the State's existing OnBase instance	Here
GovWin Contract #GSA18055-ONBASE_SFT	Publicly available documentation of Delaware Department of Natural Resources' acquisition of an OnBase solution	Here
GovWin Solicitation #OATS 14 15 70	Publicly available documentation of Florida Department of Agriculture and Consumer Services' acquisition of an OnBase solution	Here
GovWin Contract #HSMV-0293-20	Publicly available documentation of Florida Department of Highway Safety and Motor Transportation's acquisition of an OnBase solution	Here

4. Project Information

4.1 Historical Background

VDOL is looking to adopt a case and document management solution. VDOL currently generates, receives, and stores vast amounts of paper to administer its programs. Divisions, including WC and Unemployment Insurance (UI), use an outdated image scanning system that is time consuming to scan documents and inefficient to retrieve them. The department is seeking a scalable, efficient way to digitize, store, and retrieve information. It also wants to eliminate the need to store/manage paper files and to implement electronic records retention, both of which will help to minimize its paper storage footprint.

VDOL's intention was to start with WC to substantiate the document management process for VDOL and lay the foundation for other divisions to move into the OnBase platform as are they are ready. The legislature then dedicated Coronavirus Relief Funds (CRF) to VDOL for moving the documents from the Pandemic Unemployment Assistance (PUA) Salesforce portal into OnBase as part of UI Modernization. Because the CRF money comes with an end of 2020 deadline for expenditure, the PUA document management portion will be implemented first.

WC utilizes a paper claims submittal process where staff manually enter information into multiple databases, including their main 1980's era DOS-based database. The system has no ability to cross-reference the federal tax information from the Internal Revenue Service, so staff must manually research and enter that information. The original database is not able to track all currently required information, which has led to the use of the additional databases. WC also receives data from IAIABC via an EDI. WC is several versions behind the latest version of the EDI standard.

In April 2021, VDOL released an RFP to establish contracts with one or more vendors to implement a solution that meets the requirements/needs listed above. VDOL received two responses to the portion of the RFP related to implementation of OnBase case and document management for WC on the State's existing OnBase instance, and two responses to the portion of the RFP related to the in-tandem migration to IAIABC EDI Claims Version 3.1. The State's evaluation team has selected All Star for the OnBase portion of the RFP and Ebix, Inc. for the EDI portion of the RFP as its preferred vendors.

4.2 Project Goals

Through the implementation of an OnBase case and document management system and an IAIABC EDI Claims Version 3.1 solution, VDOL plans to improve the efficiency and efficacy of its work by:

- Replacing manual document management processes with an automated system

- Developing digital storage solutions

- Providing online access of forms to claimants, adjusters, and attorneys

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- Eliminating error-prone data entry steps

4.2 Project Scope

The State defines successful completion of the Project using these benchmarks:

- A scalable, efficient way to digitize, store, and retrieve information

- Elimination of the need to store/manage paper files and to implement electronic records retention

- A fully functioning online case management system for WC claims which allows WC staff to quickly create and run reports for staff, management, and the legislature

- A solution that uses Hyland's OnBase platform for both case and document management and is built upon the State's existing Department of Labor OnBase instance

- The ability to automate the State's current manual and paper-based workflows

4.3 Major Deliverables

Tables 4.1 and 4.2 provide a summary of the deliverables, including descriptions and frequency, as articulated in the draft contracts with All Star and Ebix. The frequency for some deliverables was not finalized at the time of this Independent Review.

Table 4.1: Project Deliverables and Frequency Proposed by All Star

Deliverable	Description	Frequency
Requirements Discovery Sessions (grooming)	Requirements in the form of user stories are described at a high level. Requirements will need to be refined and defined to the appropriate level of detail. Acceptance criteria shall be defined for all user stories. User stories and acceptance criteria must be captured and managed in the State's Azure Dev Ops environment.	Initially to help ensure scope of project is well understood, ongoing at the beginning of each release and/or sprint as needed
Prioritized Product Backlog	Backlog of all user stories that are prioritized according to their business value. This is an ongoing exercise through the project life cycle that is typically done before each sprint.	Ongoing, typically done before each sprint
Release & Sprint Schedule	Based on the prioritized backlog, a release & sprint schedule should be created that is incorporated into the Implementation Master Schedule (IMS).	Initially after discovery and prioritized backlog are created, updated as

Deliverable	Description	Frequency
		needed throughout
Deliverable Expectation Document (DED)	Criteria that establish what the acceptance and rejection criteria of each project deliverable is and who is responsible for approval of the deliverable.	Once per deliverable
Deliverable Acceptance Form (DAF)	Form used to obtain sign-off at the completion of each project deliverable as defined by the DED.	Once per deliverable
Change Requests	Formal document that outlines any changes to the contract scope, schedule, budget, and resources.	As needed – completed by project manager of the requesting party
Risk & Issue Log	A log of all risks and issues (opened and closed) that could (risk) or are (issue) impacting the project. Risks should be outlined by their impact and their potential to occur. All risks and issues should have an owner and a clearly defined response strategy.	Weekly (minimum) – log is kept updated by State Project Manager, but contractor project manager is expected to participate and provide risk and issue information from contractor perspective
Action Items	A log of open and resolved/completed action items. Each action item should identify an owner and date needed for completion.	As needed – completed by project manager of responsible party for the completion of the Action Items
Decision Log	A log of all decisions made over the course of the project. Decisions should have a date and name of decider.	Weekly – decisions logged by the project manager of party making decision
Test Plans	A description of the testing approach, participants, sequence of testing, and testing preparations.	Once

Deliverable	Description	Frequency
Test Cases & Results	The specific test cases and/or scripts to be tested and the testing results. Test cases must tie back to the project requirements (to help ensure each one has been met). Test cases must be documented, and results managed in the State's Azure Dev Ops environment.	Create once, then update with results
Implementation Master Schedule	The IMS outlines how the project will go live and will include a detailed plan for the exact events that need to occur, assignments to the resources involved, and the time frame for execution.	Within 30 days of contract execution, updated weekly
Project Status Reports	Provides an update on the project health, accomplishments, upcoming tasks, risks and significant issues. The Status Report and the project color being report shall be developed in consultation with the State business lead and State Project Manager.	Weekly
Meeting Agenda/ Minutes	All meetings will have an agenda and minutes. The minutes shall contain items discussed and the risks, issues, action items, and decisions made during the meeting. Minute criteria shall be transcribed over to the main logs.	Per occurrence – 24 hours prior to meeting for agendas and 24 hours after meeting for minutes

Table 4.2: Project Deliverables and Frequency Proposed by Ebix

Deliverable	Description	Frequency
Requirements Discovery Sessions (grooming)	Requirements in the form of user stories are described at a high level. Requirements will need to be refined and defined to the appropriate level of detail. Acceptance criteria shall be defined for all user stories. User stories and acceptance criteria must be captured and managed in the State's Azure Dev Ops environment.	Initially to help ensure scope of project is well understood, ongoing at the beginning of each release and/or sprint as needed
Prioritized Product Backlog	Backlog of all user stories that are prioritized according to their business value. This is an ongoing exercise through the project life cycle that is typically done before each sprint.	Ongoing, typically done before each sprint
Release & Sprint Schedule	Based on the prioritized backlog, a release & sprint schedule should be created that is incorporated into the IMS.	Initially after discovery and prioritized backlog are created, updated as

Deliverable	Description	Frequency
		needed throughout
DED	Criteria that establish what the acceptance and rejection criteria of each project deliverable is and who is responsible for approval of the deliverable.	Once per deliverable
DAF	Form used to obtain sign-off at the completion of each project deliverable as defined by the DED.	Once per deliverable
Change Requests	Formal document that outlines any changes to the contract scope, schedule, budget, and resources.	As needed – completed by project manager of the requesting party
Risk & Issue Log	A log of all risks and issues (opened and closed) that could (risk) or are (issue) impacting the project. Risks should be outlined by their impact and their potential to occur. All risks and issues should have an owner and a clearly defined response strategy.	Weekly (minimum) – log is kept updated by State Project Manager, but contractor project manager is expected to participate and provide risk and issue information from contractor perspective
Action Items	A log of open and resolved/completed action items. Each action item should identify an owner and date needed for completion.	As needed – completed by project manager of responsible party for the completion of the Action Items
Decision Log	A log of all decisions made over the course of the project. Decisions should have a date and name of decider.	Weekly – decisions logged by the project manager of party making decision
Test Plans	A description of the testing approach, participants, sequence of testing, and testing preparations.	Once
Test Cases & Results	The specific test cases and/or scripts to be tested and the testing results. Test cases must tie back to the project requirements (to help ensure each one has been met).	Create once, then update with results

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Deliverable	Description	Frequency
	Test cases must be documented, and results managed in the State's Azure Dev Ops environment.	
Implementation Master Schedule	The IMS outlines how the project will go live and will include a detailed plan for the exact events that need to occur, assignments to the resources involved, and the time frame for execution.	Within 30 days of contract execution, updated weekly
Project Status Reports	Provides an update on the project health, accomplishments, upcoming tasks, risks, and significant issues. The Status Report and the project color being report shall be developed in consultation with the State business lead and State Project Manager.	Weekly
Meeting Agenda/ Minutes	All meetings will have an agenda and minutes. The minutes shall contain items discussed and the risks, issues, action items, and decisions made during the meeting. Minute criteria shall be transcribed over to the main logs.	Per occurrence – 24 hours prior to meeting for agendas and 24 hours after meeting for minutes

4.4 Project Phases and Schedule

Table 4.3 is a summary of the project phases/milestones, dates, and tasks planned, as articulated in the draft contract with All Star (last updated on December 30, 2021).

Table 4.3: Project Phases/Milestones, Dates, and Tasks for All Star Implementation

Project Phase/Milestone	Date(s)	Tasks
Initiation	02/24/2022 – 03/14/2022	Kickoff meeting, planning and preparation of project management planning documentation, project schedule review, and obtaining software licenses
Gathering Requirements	03/15/2022 – 08/15/2022	All Star performs necessary requirements gathering to finalize functional and technical requirements and identify gaps between State requirements and Solution capabilities, including: • Works with WC team to develop future states for as-is workflows based on automation capabilities of OnBase Workflows and WorkView

Project Phase/Milestone	Date(s)	Tasks
		• Works with WC team to define document types, metadata, and keywords • Creates implementation recommendation (including phases, if necessary) • Creates Requirements Traceability Matrix
Implementation	04/27/2022 – 01/09/2023 (phased, by component)	All Star installs and configures the Solution in a test environment for scan, store, and setup of new functionality/modules for Content Composer Module, Document Composition, Unity Forms, and DocuSign integration.
Testing	07/08/2022 – 12/15/2022 (phased, by component)	State subject matter experts perform Solution testing in a test (not live) environment in accordance with All Star-developed test plans.
Training	06/30/2022 – 10/25/2022 (phased, by component)	All Star performs training of State personnel (train the trainer or train the user).
Legacy Data Migration	09/21/2022 – 07/24/2023	All Star shall perform all necessary legacy data migrations using a State-approved migration plan and data mapping templates. This data migration includes data from several databases and scanned documents.
Migration and System Testing	05/02/2023 – 07/06/2023 (phased, by type)	State subject matter experts perform Solution testing in a test environment in accordance with All Star-developed test plans.
Deployment	07/11/2023 – 07/24/2023 (final, phased, by component)	All Star implements the tested and State-approved Solution in the production environment for additional State testing and Go-Live.
Post-Implementation Support/Warranty	09/13/2023 – 07/30/2024 (phased, by component)	All Star shall be responsible for fixing all defects found during the Warranty Period. All defects found within the Warranty Period shall be corrected by All Star at no additional cost to the State.

Table 4.4 is a summary of the project phases/milestones, dates, and tasks planned, as articulated in the draft contract with Ebix (last updated on December 16, 2021). The State reported that these dates will change based on All Star's schedule, and the contract will be updated accordingly during contract negotiations.

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Table 4.4: Project Phases/Milestones, Dates, and Tasks for Ebix Implementation

Project Phase/Milestone	Date(s)	Tasks
Initiation	12/30/2021	Kickoff meeting, planning and preparation of project management planning documentation
Requirements Gathering	01/03/2022 – 05/08/2022	Ebix performs necessary requirements gathering to finalize functional and technical requirements and identify gaps between State requirements and Solution capabilities.
Implementation	05/09/2022 – 10/17/2022	Contractor installs and configures the Solution in a test environment.
Testing	01/02/2023 – 03/01/2023	State subject matter experts, both State and trading partners, perform Solution testing in a test (not live) environment, in accordance with Ebix-developed test plans. Ebix will lead both State staff and trading partners in testing.
Training	To be determined (TBD)	Ebix performs training of State personnel (train the trainer or train the user) and training of trading partners.
Legacy Data Migration	10/18/2022 – 11/17/2022	Ebix shall perform all necessary legacy data migrations using a State-approved migration plan and data mapping templates.
Deployment	03/02/2023 – 03/20/2023	Ebix implements the tested and State-approved Solution in the production environment for additional State testing and Go-Live.
Post-Implementation Support/Warranty	03/22/2023 – 04/28/2023	Ebix shall be responsible for fixing all defects found during the Warranty Period. All defects found within the Warranty Period shall be corrected by Ebix at no additional cost to the State.

5. Acquisition Cost Assessment

Table 5.1 includes a summary of acquisition costs reported to BerryDunn during this Independent Review.

Table 0.1: Acquisition Cost Assessment

Acquisition Costs	Cost	Comments
Hardware	$13,116	Fujitsu FI-7900 Document Scanner, paid in FY22
Software/Licensing	$151,120.91	$75,000 for OnBase, $60,000 for Content Composer Module, and $16,120.91 for Document Composer
Other Costs	$4,579	Fujitsu scanner three-year service plan/warranty, paid in FY22
Implementation Services	$1,157,626	$1,085,376 for All Star and $72,250 for Ebix
Other Professional Services	$30,000	Professional services for penetration testing
ADS EPMO Project Oversight	$13,816	Provided by the State in Section 6 of the IT ABC Form
ADS EPMO Project Manager	$110,528	Provided by the State in Section 6 of the IT ABC Form
ADS EPMO Business Analyst (BA)	$88,000	Provided by the State in Section 6 of the IT ABC Form
ADS EA	$54,912	Provided by the State in Section 6 of the IT ABC Form
ADS Security Staff	$5,280	Provided by the State in Section 6 of the IT ABC Form
ADS IT Labor	$174,720	Provided by the State in Section 6 of the IT ABC Form
Independent Review	$24,500	BerryDunn's services
Total One-Time Acquisition Costs	**$1,828,194.91**	

1. **Cost Validation:** Describe how you validated the acquisition costs.

   BerryDunn validated acquisition costs during documentation review and interviews with the State Project Manager.

2. **Cost Comparison:** How do the acquisition costs of the proposed solution compare to what others have paid for similar solutions? Will the State be paying more, less, or about the same?

BerryDunn researched GovWin—a government contracting intelligence platform from Deltek—to research what other state government agencies have paid for similar solutions and implementation services. In Table 5.2 below, BerryDunn compared the anticipated cost for VDOL's acquisition for the OnBase implementation to peer states that have recently acquired OnBase.

Table 0.2: OnBase Acquisition Cost Assessment for Peer State Agencies

State Agency	Acquisition Cost
Delaware Department of Natural Resources	$229,722.68
Florida Department of Agriculture and Consumer Services	$67,707.44
Florida Department of Highway Safety and Motor Transportation	$40,302.27

Given potential differences in functionality included in these systems acquired by other states, this analysis is intended to be directional in nature and should not serve as a basis for what Vermont should be paying for this acquisition.

Due to the limited amount of publically available cost information for similar solutions, we based our cost assessment on the work we have done in other states during the planning and implementation of case management, document management, and integration services solutions.

3. **Cost Assessment:** Are the acquisition costs valid and appropriate in your professional opinion? List any concerns or issues with the costs.

Based on BerryDunn's experience working with other state government agencies during system planning, procurement, and implementation, we believe the State is paying comparable costs to similar solutions and implementation services in the market.

6. Technology Architecture and Standards Review

1. **State's IT Strategic Plan:** Describe how the proposed solution aligns with each of the State's IT Strategic Principles:

     a. Assess how well the technology solution aligns with the business direction

     b. Assess how well the technology solution maximizes benefits for the State

     c. Assess how well the information architecture of the technology solution adheres to the principle of Information is an Asset

     d. Assess if the technology solution will optimize process

     e. Assess how well the technology solution supports resilience-driven security

All Star will be responsible for the configuration and implementation of the OnBase case and document management system, while Ebix will be responsible for the implementation of its proposed WCIRS.

BerryDunn determined that OnBase and the WCIRS solution align with VDOL's goal to achieve government efficiency through innovations based upon review of All Star's proposal (and BerryDunn's knowledge/understanding of the OnBase solution), Ebix's proposal, VDOL's 2018 – 2023 strategic plan, and stakeholder interviews. Specifically, BerryDunn believes the following alignment will be achieved through successful implementation of the solution:

Key Indicators of Goal Achievement from VDOL's 2018 – 2023 Strategic Plan	Expected Benefits from Successful Implementation
Savings in staff time	Replacing manual document management processes with an automated system
Improved customer service	Providing online access of forms to claimants, adjusters, and attorneys
Reduced errors/corrections	Eliminating error-prone data entry steps through online form completion

In regards to how well the technology solution supports resilience-driven security, All Star will be using the State's existing OnBase platform for this project, as requested in the RFP. Therefore, the State and All Star will be responsible to implement any procedure necessary to safeguard the integrity and security of the solution and data used in the system from access by unauthorized persons. Furthermore, the content of any data file, the selection and implementation of controls on its access and use, and the security of stored data is also the responsibility of the State and All Star. BerryDunn confirmed via stakeholder interviews that State staff have no concerns regarding the security of the existing OnBase platform. In regards to WCIRS, Ebix's proposal indicated that the solution will meet all security

requirements and compliance with such is regularly monitored and tested via a third party—and BerryDunn confirmed via stakeholder interviews that State staff have no concerns regarding the security of the solution. Ebix's WCIRS also uses Secure File Transfer Protocol (FTP) with Pretty Good Privacy (PGP) encryption or 128-bit Hypertext Transfer Protocol Secure (HTTPS) for secure data imports, and Ebix has a Statement on Standards for Attestation Engagements number 16 (SSAE 16) certified data center with all the security and redundant infrastructure that is required for this certification.

2. **Sustainability:** Comment on the sustainability of the solution's technical architecture (i.e., is it sustainable?).

BerryDunn believes OnBase's technical architecture is sustainable, as it is currently used by UI and other Vermont agencies as a document and workflow management solution.

The WCIRS is a web-based, SaaS solution. Therefore, Ebix will host the solution and provide annual support and maintenance for it. BerryDunn therefore believes the WCIRS solution's technical architecture is sustainable.

3. **How does the solution comply with the ADS Strategic Goals enumerated in the ADS Strategic Plan of January 2020?**

BerryDunn determined that OnBase and WCIRS comply with the principles enumerated in the ADS Strategic Plan of January 2020 based upon review of All Star's proposal (and BerryDunn's knowledge/understanding of the OnBase solution), Ebix's proposal, the ADS Strategic Plan of January 2020, and stakeholder interviews as follows:

ADS Strategic Principles	Solution Compliance with ADS Strategic Principles
Transform our customer experience • Deliver measurable value to our partners in State government • Engage early and often • Be honest about the scope of our challenges • Work with agencies to understand their mission	Providing automated forms to claimants, adjusters, and attorneys

ADS Strategic Principles	Solution Compliance with ADS Strategic Principles
Invest in Agency and Project Success • Innovate and operate effectively and efficiently • Master the fundamentals to be the best • Balance the value of developing new capabilities with project risk and cost • Provide training and empower our employees	Replacing manual processes with an automated system and eliminating error-prone data entry steps through online form completion
Invest in our Technology • Continuous improvement requires continuous education • Reuse existing technology solutions before buying new, buy before build	Expanding the use of the existing OnBase platform being used by UI and other State agencies
Secure Vermont's Data • Security is everyone's responsibility • Data, not systems, is our most important asset	WCIRS uses Secure FTP with PGP encryption or HTTPS (128-bit) for secure data imports, and Ebix has a SSAE 16 certified data center with all the security and redundant infrastructure that is required for this certification.

4. **Compliance with the Section 508 Amendment to the Rehabilitation Act of 1973, as amended in 1998:** Comment on the solution's compliance with accessibility standards as outlined in this amendment. Reference: http://www.section508.gov/content/learn.

It is BerryDunn's understanding that compliance with the Section 508 is not pertinent to this contract, as the State did not include it in the requirements.

5. **Disaster Recovery:** What is your assessment of the proposed solution's disaster recovery plan; do you think it is adequate? How might it be improved? Are there specific actions that you would recommend to improve the plan?

Because VDOL is leveraging the current OnBase platform, the State will be responsible for:

• Physically maintaining and operating the DEV, TEST, and PROD hardware and software environment required for the OnBase solution

• Establishing and maintaining appropriate backups of all system servers used in every environment (i.e., DEV, TEST, and PROD)

- Establishing and maintaining appropriate backups of all system-related databases in every environment (i.e., DEV, TEST, and PROD)

- Establishing the appropriate backup or redundancy of all documents stored in the system

Regarding WCIRS, Ebix regularly backs up its virtual servers and components and restores at its warm recovery site, which is documented in its Disaster Recovery Procedure and reviewed as a part of the SOC2 audit. Ebix maintains 24 hours as the recovery time object, with 24 hours of recovery point objective, for WCIRS.

6. **Data Retention:** Describe the relevant data retention needs and how they will be satisfied for or by the proposed solution.

   Because VDOL is leveraging the current OnBase platform, the State will be responsible for all data retention.

   BerryDunn confirmed via interview that Ebix will retain all data indefinitely, until VDOL requests removal.

7. **SLA:** What are the post-implementation services and service levels required by the State? Is the vendor-proposed Service Level Agreements (SLAs) adequate to meet these needs in your judgment?

   The State's fully reviewed and updated contracts include post-go-live support expectations for the 12-month support period, defined service level agreement terms, metrics, performance targets, and remediating procedures. BerryDunn believes these services and service levels will meet the State's needs.

8. **System Integration:** Is the data export reporting capability of the proposed solution consumable by the State? What data is exchanged and what systems (State and non-State) will the solution integrate/interface with?

   The OnBase case and document management system will need to integrate/interface with the following systems:

   - DocuSign – Signing documents created and routed in WC workflows

   - Microsoft Outlook – Sending emails and scheduling meetings for contacts that are stored in OnBase

   - UI Database – Uploading UI's New Vermont Employer Report

   - ACCESS – Sending First Report of Injury data to the Office of Child Support

   - EDI Claims Processing Solution – Collecting, storing, and reporting WC injury claims data

OnBase has data export capabilities that are consumable by the State.

Based on Ebix's proposal, the WCIRS solution includes an open source business intelligence platform that provides statistical analysis capabilities for common WC EDI issues and questions (e.g., how accurate is the data, how often are trading partners submitting data, etc.).

7. Assessment of Implementation Plan

1. **The reality of the implementation timetable.**

   The OnBase implementation timeline is grouped into the following phases:

   - Initiation: 02/24/2022 – 03/14/2022

   - Gathering requirements: 03/15/2022 – 08/15/2022

   - Implementation: 04/27/2022 – 01/09/2023

   - Testing: 07/08/2022 – 12/15/2022

   - Training: 06/30/2022 – 10/25/2022

   - Legacy data migration: 09/21/2022 – 07/24/2023

   - Migration and system testing: 05/02/2023 – 07/06/2023

   - Deployment: 07/11/2023 – 07/24/2023

   - Post-implementation support/warranty: 09/13/2023 – 07/30/2024

   At the point of this Independent Review, the exact timing of these phases for Ebix's scope of work was unknown. However, the project team reported that Ebix and the State will finalize the WCIRS implementation timeline during the contract negotiation period.

   BerryDunn has no concerns with the above-listed implementation time frames/durations, but has identified the following factors that might cause delay if not mitigated (which are further detailed in Attachment 2 – Risk Register):

   - There is a current resource strain in regards to the Project's EA resource.

   - The approach for providing All Star with access to necessary State systems is to partner it with a State liaison (i.e., proxy access) rather than providing All Star with virtual private network (VPN) access.

   - All Star has not implemented a case management workflow module for any clients—only for its own instance that is used for internal business processes.

   - The two vendors will need to reach consensus on the timing of each of their testing and implementation activities and then coordinate the execution of those activities.

   - The State has identified certain data quality issues within the current WC IT systems and requires the State to complete data cleansing activities prior to the commencement of data migration and conversion activities.

2. **Readiness of impacted divisions/departments to participate in this solution/project (consider current culture, staff buy-in, organizational changes needed, and leadership readiness).**

   While VDOL project leadership stated the WC staff are excited for the implementation of a new solution, the State does not have a planned OCM approach for addressing the following concerns:

   - Many staff members are close to retirement and might be resistant to learning a new system and processes.

   - Trading partners will experience a large change and learning curve in regards to the information they will need to report to VDOL (with the IAIABC EDI Claims upgrade from version 1.0 to version 3.1).

   - The primary champion for the Project, the WC Director, is retiring on 12/31/2021.

   The absence of an OCM strategy and plan might lead to lack of adoption of the new solutions and slow/prevent achievement of Project goals/objectives.

3. **Do the milestones and deliverables proposed by the vendor provide enough detail to hold the vendor accountable for meeting the business needs in these areas?**

   a. **Project Management**

      BerryDunn determined through review of the draft contracts between the State and All Star/Ebix that the contracts contain enough detail to hold the vendors accountable for meeting the business needs in the area of project management. The contracts detail the roles/responsibilities of the vendors' project managers, the deliverables the project managers are responsible for developing/maintaining and their description, the timing for development/updates for each, and the major phases and their descriptions (with a requirement for the project managers to determine dates/durations for each post-contract execution).

   b. **Training**

      BerryDunn determined, through review of the draft contracts between the State and All Star/Ebix, that the contracts—from BerryDunn's perspective—do not have enough detail to hold the vendors accountable for meeting the business needs in the area of training. BerryDunn believes the language that details the vendors' training effort requirements is too high-level to help ensure VDOL's business needs are met. There also appears to be a lack of training deliverables, such as a training plan, that the vendors need to develop/deliver—which might later elaborate on the necessary details of the expected training efforts.

   c. **Testing**

BerryDunn determined, through review of the draft contracts between the State and All Star/Ebix, that the contracts contain enough detail to hold the vendors accountable for meeting the business needs in the area of testing. The contracts detail the roles/responsibilities of the vendors, the deliverables the vendors are responsible for developing/maintaining and their description, the timing for development/updates for each, and the major phases and their descriptions (with a requirement for the vendors to update/determine dates/durations for each post-contract execution).

d. Design

BerryDunn believes the draft contracts between the State and All Star/Ebix contain enough detail to hold the vendors accountable for meeting the business needs in the area of design. The contracts detail the roles/responsibilities of the vendors, the deliverables the vendors are responsible for developing/maintaining and their description, the timing for development/updates for each, the major phases and their descriptions, and user stories/workflows/requirements to be complied with and/or met.

e. Conversion (If Applicable)

BerryDunn determined through review of the draft contracts between the State and All Star/Ebix that the contracts contain enough detail to hold the vendors accountable for meeting the business needs in the area of data conversion and migration. The contracts detail the roles/responsibilities of the vendors, the deliverables the vendors are responsible for developing/maintaining and their description, the timing for development/updates for each, the major phases and their descriptions, and user stories/requirements to be complied with and/or met, a list of the in-scope databases to be migrated, and a database dictionary.

f. Implementation Planning

BerryDunn determined through review of the draft contracts between the State and All Star/Ebix that the contracts contain enough detail to hold the vendors accountable for meeting the business needs in the area of implementation planning. The contracts detail the roles/responsibilities of the vendors, the deliverables the vendors are responsible for developing/maintaining and their description, the timing for development/updates for each, and the major phases and their descriptions (including initiation/project introduction and gathering requirements/analysis and design phases).

g. Implementation

BerryDunn determined through review of the draft contracts between the State and All Star/Ebix that the contracts contain enough detail to hold the vendors accountable for meeting the business needs in the area of implementation. The contracts detail the roles/responsibilities of the vendors, the deliverables the vendors are responsible

for developing/maintaining and their description, the timing for development/updates for each, the major phases and their descriptions (with a requirement for the project managers to determine dates/durations for each post-contract execution), and user stories/requirements to be complied with and/or met.

4. **Does the State have a resource lined up to be the project manager on the project? If so, does this person possess the skills and experience to be successful in this role in your judgment? Please explain.**

Based on BerryDunn's interactions with the State Project Manager, during this Independent Review and previous Independent Reviews, we have confidence that the individual has the skills and experience necessary for the role. However, the State Project Manager is currently allocated eight hours per week to the Project, and is responsible for developing, monitoring, and maintaining an integrated master Project schedule that covers both of the vendors' efforts—in addition to the other responsibilities (e.g., risk/issue management). We believe that eight hours per week might not be enough time to effectively perform these duties.

8. Cost Analysis and Model for Benefit Analysis

1. **Analysis Description:** Provide a narrative summary of the cost-benefit analysis conducted. Be sure to indicate how the costs were independently validated.

   BerryDunn evaluated the costs provided by the State in the IT ABC Form and draft contracts with All Star and Ebix. Costs in Attachment 1 – Life Cycle Cost-Benefit Analysis were verified in interviews and follow-up conversations with the State.

   BerryDunn discussed the benefits of the new solution during interviews with the State, which are incorporated in this report.

2. **Assumptions:** List any assumptions made in your analysis.

   BerryDunn used the following assumptions when conducting the cost-benefit analysis:

   - The project will begin in February 2022 and implementation will be completed in July 2024.

   - The State will not incur any costs for implementation services until August 2022 (e.g., FY23).

3. **Funding:** Provide the funding source(s). If multiple sources, indicate the percentage of each source for both acquisition costs and ongoing operational costs over the duration of the system/service life cycle.

   The State will pay 100% of the acquisition costs and ongoing operational costs with funding from the Workers' Compensation Administration Fund created by 21 VSA §711, which establishes an annual assessment (currently 1.4%) to be levied on WC premiums paid by employers and collected by private WC insurers, as well as a 1% levy on WC losses paid by self-insured employers.

4. **Tangible Costs and Benefits:** Provide a list and description of the tangible costs and benefits of this project. It is "tangible" if it has a direct impact on implementation or operating costs (an increase = a tangible cost, and a decrease = a tangible benefit). The cost of software licenses is an example of a tangible cost. Projected annual operating cost savings is an example of a tangible benefit.

   The project will result in several tangible costs and benefits, including:

   Tangible Costs

   - **Implementation Services –** A one-time cost of $1,157,626 for implementation services, which includes installation, configuration, deployment, and training.

   - **Hardware, Equipment and Supplies, and Licenses –** The one-time costs for implementation total $168,812.91.

- **ADS EPMO Project Oversight, Project Management, BA, Security, EA, and Other State Labor –** These one-time costs total $447,256.

- **Other Costs –** The State has planned for a cost of $24,500 for Independent Review services from BerryDunn, and $30,000 for penetration testing.

Tangible Benefits:

Based on BerryDunn's analysis, tangible benefits are speculative. Through automated workflows, staff will be relieved of manual or work-around processes and can focus on other responsibilities for supporting WC operations. VDOL reported that any cost savings—as a result from the implementation of a new solution—will not be available until after future-state processes are operational.

Intangible Costs and Benefits: Provide a list and descriptions of the intangible costs and benefits. It's "intangible" if it has a positive or negative impact but is not cost related. Examples: Customer service is expected to improve (intangible benefit) or employee morale is expected to decline (intangible cost).

The implementation might result in several intangible benefits, including:

- **Improved morale –** A modern case management and document management solution will increase productivity and job satisfaction among State staff due to no longer needing to look through files and other paper documents.

- **Enhanced Functionality –** A modern case management and document management solution will allow the State to optimize the WC program, improve accessibility, and automate form processing steps.

- **Risk Reduction –** A modern case management and document management solution will decrease the probability of files being lost or damaged.

- **Simplification of database management –** The State will be able to reduce the number of databases currently being used to support the needs of WC.

5. **Costs vs. Benefits:** Do the benefits of this project (consider both tangible and intangible) outweigh the costs in your opinion? Please elaborate on your response.

While the tangible benefits appear negligible, BerryDunn's opinion is that the intangible benefits for the State outweigh the costs. Although the State will experience an increase in cost, having a modern case management and document management solution—integrated with a compliant EDI claims processing solution—is an industry standard for state WC departments.

6. **IT ABC Form Review:** Review the IT ABC form (Business Case/Cost Analysis) created by the Business for this project. Is the information consistent with your Independent Review and analysis? If not, please describe. Is the life cycle that was used appropriate for the technology being proposed? If not, please explain.

BerryDunn found some inconsistencies with the costs in Section 6. Proposed Solution Costs and the cost descriptions in Section 10. Comments and Additional Information in the most recent version of the IT ABC form. For example, Section 6 has a cost of $110,528 for the ADS EPMO Project Manager, and Section 10 notes a cost of $102,960. BerryDunn recommends that the project team update the IT ABC form so the correct costs and supporting details are aligned throughout the document.

9. Analysis of Alternatives

1. **Provide a brief analysis of alternative solutions that were deemed financially unfeasible.**

2. **Provide a brief analysis of alternative technical solutions that were deemed unsustainable.**

3. **Provide a brief analysis of alternative technical solutions where the costs for operations and maintenance were unfeasible.**

Before releasing the RFP, VDOL and ADS explored Salesforce as an alternative solution for case and document management and then ruled it out due to the expected costs—weighed against the OnBase solution. VDOL UI was also moving its data from the Salesforce to OnBase solution when the decision was made, so transitioning WC to OnBase—coupling document/data repository and case management together—was determined to be the best fit.

Through the proposal evaluation process, the State evaluation team deemed Hyland's approach as unfeasible due, in part, to less details offered in the implementation schedule in its initial proposal. Hyland also did not offer any rationale for pricing changes in its Best and Final Offer.

The State evaluation team also deemed Verisk-ISO unfeasible due, in part, to its inability to comply with Attachment C: Standard State Contract Provisions and Attachment D: Other Terms and Conditions for Information Technology Contract.

10. Impact on Analysis of Net Operating Costs

1. **Insert a table to illustrate the Net Operating Cost Impact.**

Table 10.1: Life Cycle Costs by FY

Impact on Operating Costs	FY22	FY23	FY24	FY25	FY26	Five-Year Totals
Professional Services (Non-Software Costs)						
Current Costs	$0	$0	$0	$0	$0	$0
Projected Costs	$24,500	$662,751	$524,875	$0	$0	**$1,212,126**
Maintenance, Support, Hardware, and Licenses Costs						
Current Costs	$14,369	$14,369	$14,369	$14,369	$14,369	**$71,845**
Projected Costs	$17,692	$243,076.91	$243,092	$176,324	$176,324	**$856,508.91**
Other Costs (State Labor)						
Current Costs	$249,886	$249,886	$249,886	$249,886	$249,886	**$1,249,430**
Projected Costs	$124,235	$298,170	$286,931	$262,080	$262,080	**$1,233,496**
Baseline Current Cost	$264,255	$264,255	$264,255	$264,255	$264,255	**$1,321,275**
Baseline Projected Costs	$166,427	$1,127,877	$1,054,898	$438,404	$438,404	**$3,302,130.91**
Cumulative Current Costs	$264,255	$528,510	$792,765	$1,057,020	$1,321,275	**$1,321,275**
Cumulative Projected Costs	$166,427	$1,445,424.91	$2,500,322.91	$2,938,726.91	$3,377,130.91	**$3,302,130.91**
Net Impact on Professional Services	($24,500)	($662,751)	($524,875)	$0	$0	**($1,212,126)**
Net Impact on Maintenance, Support, Hardware, Licenses Costs, and Other Costs	$122,328	($276,991.91)	($265,768)	($174,149)	($174,149)	**($768,729.91)**
Net Impact on Operating Costs	$97,828	($939,742.91)	($790,643)	($174,149)	($174,149)	**($1,980,855.91)**

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2. **Provide a narrative summary of the analysis conducted and include a list of any assumptions.**

BerryDunn used the following costs and calculations in performing the impact analysis on net operating costs:

- The projected costs for Professional Services in FY22 include $24,500 for BerryDunn's services for this Independent Review

- The projected costs for Professional Services in FY23 include:

    o Implementation Services for All Star: $632,751

    o Penetration Testing: $30,000

- The projected costs for Professional Services in FY24 include:

    o Implementation Services for Ebix: $72,250

    o Implementation Services for All Star: $452,625

- The current costs for Maintenance, Support, Hardware, and Licenses Costs in FY22 through FY26 include:

    o Hardware: $369

    o Vendor Annual Maintenance/Services Costs: $14,000

- The projected costs for Maintenance, Support, Hardware, and Licenses Costs in FY22 include:

    o Fujitsu Scanner Three-Year Service Plan/Warranty: $4,576

    o Fujitsu Scanners: $13,116

- The projected costs for Maintenance, Support, Hardware, and Licenses Costs in FY23 include:

    o OnBase Licenses: $75,000

    o Content Composer Module: $60,000

    o Document Composer: $16,120.91

    o Hardware (servers): $36,324

    o Vendor Annual Maintenance/Services Costs (All Star): $55,632

- The projected costs for Maintenance, Support, Hardware, and Licenses Costs in FY24 include:

    o OnBase Licenses: $75,000

- o Hardware (servers): $36,324

- o Hosting (WCIRS): $45,000

- o Vendor Annual Maintenance/Services Costs (All Star): $66,768

- o Vendor Annual Maintenance/Services Costs (Ebix): $20,000

- The projected costs for Maintenance, Support, Hardware, and Licenses Costs in FY25 and FY26 include:

  - o OnBase Licenses: $75,000

  - o Hardware (servers): $36,324

  - o Hosting (WCIRS): $45,000

  - o Vendor Annual Maintenance/Services Costs (Ebix): $20,000

- The projected costs for State Labor for FY22 include:

  - o ADS EPMO Oversight: $3,835

  - o ADS EPMO Project Manager: $30,700

  - o ADS EPMO BA: $24,445

  - o ADS EA: $15,255

  - o ADS Security Staff: $1,465

  - o Other State Labor: $48,535

- The projected costs for State Labor for FY23 include:

  - o ADS EPMO Oversight: $9,210

  - o ADS EPMO Project Manager: $73,688

  - o ADS EPMO BA: $58,666

  - o ADS EA: $36,606

  - o ADS Security Staff: $3,522

  - o Other State Labor: $116,478

- The projected costs for State Labor for FY24 include:

  - o ADS EPMO Oversight: $771

  - o ADS EPMO Project Manager: $6,140

  - o ADS EPMO BA: $4,889

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- o   ADS EA: $3,051

- o   ADS Security Staff: $293

- o   Other State Labor: $9,707

- o   State Labor to Operate/Maintain the Solution: $262,080

- The projected costs for State Labor for FY25 and FY26 include:

  - o   State Labor to Operate/Maintain the Solution: $262,080

BerryDunn used the following assumptions for this analysis:

- The project will begin in February 2022 and implementation will be completed in July 2024.

- The State will not incur any costs for implementation services until August 2022 (e.g., FY23).

3. **Explain any net operating increases that will be covered by federal funding. Will this funding cover the entire life cycle? If not, please provide the breakouts by year.**

No federal funding is planned to be used for funding net operating increases. All funding will come from the Workers' Compensation Administration Fund created by 21 VSA §711, which establishes an annual assessment (currently 1.4%) to be levied on WC premiums paid by employers and collected by private WC insurers, as well as a 1% levy on WC losses paid by self-insured employers.

4. **What is the break-even point for this IT activity (considering implementation and ongoing operating costs)?**

As depicted in Figure 10.1, there is not a break-even point due to new ongoing operating costs. The State will expend most one-time fees on vendor professional services, which will result in a cost decrease at Year 4. However, the costs do not break even with the annual rise in costs for the new solution.

(Note: The additional costs will result in improved functionality for WC. Additional information can be found in Section 8. Cost Analysis and Model for Benefit Analysis above.)

Figure 10.1: Baseline Current and Baseline Projected Costs
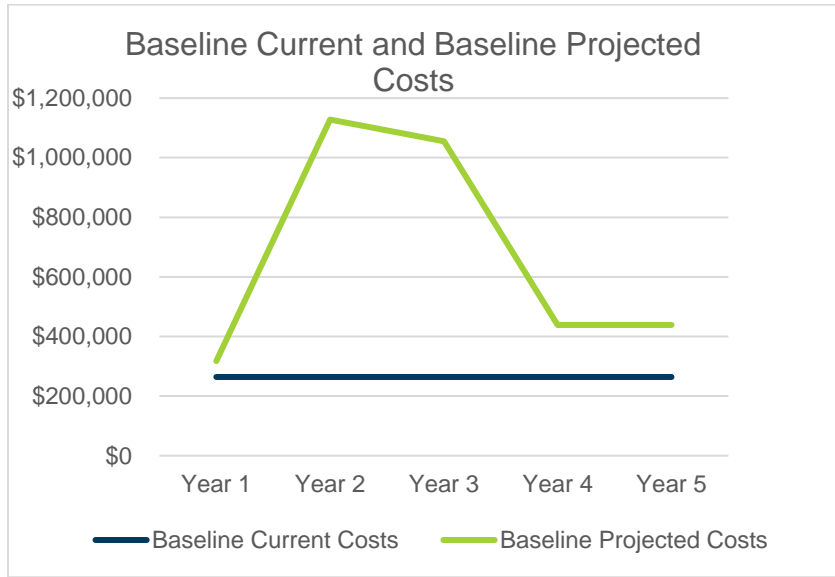
11. Security Assessment

1. Will the new system have its own information security controls, rely on the State's controls, or incorporate both?

All Star will be using the existing OnBase platform for this project as requested in the RFP. Therefore, the State will be responsible to implement any procedure necessary to safeguard the integrity and security of the solution and data used in the system from access by unauthorized persons. Furthermore, the content of any data file, the selection and implementation of controls on its access and use, and the security of stored data is also the responsibility of the State. BerryDunn confirmed via stakeholder interviews that State staff have no concerns regarding the security of the existing OnBase platform. In regards to the upgrading of IAIABC EDI Claims to Version 3.1, Ebix's proposal indicated that the solution will meet all security requirements and that compliance with such is regularly monitored and tested via a third party—and BerryDunn confirmed via stakeholder interviews that State staff have no concerns regarding the security of the solution. WCIRS also uses Secure FTP with PGP encryption or HTTPS (128-bit) for secure data imports, and Ebix has a SSAE 16 certified data center with all the security and redundant infrastructure that is required for this certification.

2. What method does the system use for data classification?

All Star stated in its proposal that data classification will be based on the existing OnBase platform.

Ebix confirmed that the following data types will be securely stored, accessed, and transmitted with WCIRS:

- Publicly Available Information

- Affordable Care Act Confidential Personally Identifiable Information (PII)

- Federal Tax Information (FTI)

- Personal Health Information (PHI)

- Medicaid Information

- Prescription Information

3. What is the vendor's breach notification and incident response process?

All Star will be using the existing OnBase platform for this project, as requested in the RFP. Therefore, the State will be responsible for the breach notification and incident response process.

Section 6 of Attachment D in the State's contract with Ebix outlines all the noticing, reporting, and documenting requirements Ebix must adhere to for breaches. Section 1.10

and 1.12 of Attachment F of the State's contract with Ebix outlines the incident notification process and SLAs for incident notification and response Ebix must adhere to.

4. **Does the vendor have a risk management program that specifically addresses information security risks?**

   All Star will be using the existing OnBase platform for this project as requested in the RFP. Therefore, the State will be responsible for risk management that specifically addresses information security risks for the OnBase solution.

   In regards to WCIRS, Ebix's proposal indicated that the solution will meet all security requirements and that compliance with such is regularly monitored and tested via a third party. The State's contract with Ebix also states Ebix's risk assessment practices include, but are not limited to, continual third-party vulnerability assessment and penetration testing.

5. **What encryption controls/technologies does the system use to protect data at rest and in transit?**

   All Star will be using the existing OnBase platform for this project as requested in the RFP. Therefore, the State will be responsible for data encryption.

   Ebix uses SFTP HTTPS (128-bit) encryption for data imports.

6. **What format does the vendor use for continuous vulnerability management, what process is used for remediation, and how does it report vulnerabilities to customers?**

   All Star will be using the existing OnBase platform for this project, as requested in the RFP. Therefore, the State will be responsible for continuous vulnerability management.

   The State's contract with Ebix states that Ebix will:

   - Run quarterly vulnerability assessments and promptly report the results to the State

   - Remediate all critical issues within 90 days, all medium issues within 120 days, and low issues within 180 days, and once remediation is complete shall re-perform the test

   - Obtain written State approval for any exceptions

12. Risk Assessment and Risk Register

This section describes the process for development of a Risk Register; including the following activities:

A. *Ask the Independent Review participants to provide a list of the risks that they have identified and their strategies for addressing those risks.*

B. *Independently validate the risk information provided by the State and/or vendor and assess their risk strategies.*

C. *Identify any additional risks.*

D. *Ask the Business to respond to your identified risks, as well as provide strategies to address them.*

E. *Assess the risk strategies provided by the Business for the additional risks you identified.*

F. *Document all this information in a Risk Register and label it Attachment 2. The Risk Register should include the following:*

- ***Source of Risk:*** *Project, Proposed Solution, Vendor, or Other*
- ***Risk Description:*** *Provide a description of what the risk entails*
- ***Risk Ratings to Indicate:*** *Likelihood and probability of risk occurrence, impact should risk occur, and overall risk rating (high, medium, or low priority)*
- ***State's Planned Risk Strategy:*** *Avoid, Mitigate, Transfer, or Accept*
- ***State's Planned Risk Response:*** *Describe what the State plans to do (if anything) to address the risk*
- ***Timing of Risk Response:*** *Describe the planned timing for carrying out the risk response (e.g., prior to the start of the project, during the Planning Phase, prior to implementation, etc.)*
- ***Reviewer's Assessment of State's Planned Response:*** *Indicate if the planned response is adequate/appropriate in your judgment, and if not, what would you recommend?*

Additional Comments on Risks:

The risks identified during this Independent Review can be found in Attachment 2 – Risk Register.

Attachment 1 – Life Cycle Cost-Benefit Analysis

Table A.1 on the following page reflects a five-year life cycle cost analysis for the WC solution.

Table A.1: Life Cycle Analysis

Description	Initial Implementation	Initial Implementation	Initial Implementation	Maintenance	Maintenance	Maintenance	Maintenance	Total
	FY22	FY23	FY24	FY23	FY24	FY25	FY26	
Implementation Services	$0	$632,751	$524,875	$0	$0	$0	$0	**$1,157,626**
Software/Licenses	$0	$151,120.91	$0	$0	$75,000	$75,000	$75,000	**$451,120.91**
Hosting	$0	$0	$0	$0	$45,000	$45,000	$45,000	**$135,000**
Hardware	$4,576	$0	$0	$36,324	$36,324	$36,324	$36,324	**$149,872**
Equipment and Supplies	$13,116	$0	$0	$0	$0	$0	$0	**$13,116**
Other Professional Services								
Penetration Test	$0	$30,000	$0	$0	$0	$0	$0	**$30,000**
All Star Annual Maintenance/Support	$0	$0	$0	$55,632	$66,768	$0	$0	**$122,400**
Ebix Annual Maintenance/Support	$0	$0	$0	$0	$20,000	$20,000	$20,000	**$60,000**
State Labor Costs								
ADS EPMO Project Oversight	$3,835	$9,210	$771	$0	$0	$0	$0	**$13,816**
ADS EPMO Project Manager	$30,700	$73,688	$6,140	$0	$0	$0	$0	**$110,528**
ADS EPMO BA	$24,445	$58,666	$4,889	$0	$0	$0	$0	**$88,000**

Description	Initial Implementation FY22	Initial Implementation FY23	Initial Implementation FY24	Maintenance FY23	Maintenance FY24	Maintenance FY25	Maintenance FY26	Total
ADS EA	$15,255	$36,606	$3,051	$0	$0	$0	$0	**$54,912**
ADS Security Staff	$1,465	$3,522	$293	$0	$0	$0	$0	**$5,280**
Other State Labor	$48,535	$116,478	$9,707	$0	$0	$0	$0	**$174,720**
State Labor to Maintain the Solution	$0	$0	$0	$0	$262,080	$262,080	$262,080	**$786,240**
Totals								
Implementation Costs & State Labor Costs	**$141,927**	**$1,112,041.91**	**$549,726**					**$1,803,694.91**
BerryDunn IR	**$24,500**							**$24,500**
Total Implementation	**$166,427**	**$1,112,041.91**	**$549,726**					**$1,828,194.91**
Total Life Cycle Operating Costs				**$91,956**	**$505,172**	**$438,404**	**$438,404**	**$1,473,936**
Total Life Cycle Costs to be Paid With State Funds	**$166,427**	**$1,112,041.91**	**$549,726**	**$91,956**	**$505,172**	**$438,404**	**$438,404**	**$3,302,130.91**
Total Life Cycle Costs to be Paid With Federal Funds	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

Attachment 2 – Risk Register

Data Element	Description
Risk #	Sequential number assigned to a risk to be used when referring to the risk.
Risk Probability, Impact, Overall Rating	Two-value indicator of the potential impact of the risk if it were to occur, along with an indicator of the probability of the risk occurring. Assigned values are High, Medium, or Low.
Source of Risk	Source of the risk, which might be interviews with the State, project documentation review, or vendor interview.
Risk Description	Brief narrative description of the identified risk.
State's Planned Risk Strategy	Strategy the State plans to take to address the risk. Assigned values are Avoid, Mitigate, Transfer, or Accept.
State's Planned Risk Response	Risk response the State plans to adopt based on discussions between State staff and BerryDunn reviewers.
Timing of Risk Response	Planned timing for carrying out the risk response, which might be prior to contract execution or subsequent to contract execution.
Reviewer's Assessment of State's Planned Response	Indication of whether BerryDunn reviewers feel the planned response is adequate and appropriate, and recommendations if not.

Risk #:	Risk Likelihood/Probability:	Risk Impact:	Overall Risk Rating:
1	High	High	High

Source of Risk: Interview with vendor

Risk Description: All Star has not implemented a case management workflow module for any clients—only for its own instance that is used for internal business processes. The vendor's inexperience with implementing this module for a workers' compensation agency might lead to a longer than expected Project schedule and/or unexpected barriers/challenges.

State's Planned Risk Strategy: Mitigate

State's Planned Risk Response: The Case Management workflow component represents 15% of the overall software implementation, if additional time or discovery is needed, we will work to keep within the timeline by efficiencies in other areas where there is extensive vendor experience. If the timeline needs to be extended, we will consider on a case-by-case basis. The current YODA system vendor is on a yearly renewal for support and could be extended if needed.

Timing of Risk Response: Pre- and Post-Contract Execution.

Reviewer's Assessment of State's Planned Response: The State's Planned Risk Response is acceptable. BerryDunn also recommends that, if necessary, All Star leverage Hyland resources should they encounter challenges that they cannot reasonably overcome with their own resources. Through review of All Star's proposal, it is BerryDunn's understanding that All Star has, and can, partner with Hyland in such a manner if needed.

Risk #:	Risk Likelihood/Probability:	Risk Impact:	Overall Risk Rating:
2	High	High	High

Source of Risk: Interviews with the State and vendors, and document review

Risk Description: The State does not have a planned OCM approach for addressing the following concerns:

- Many staff members are at retirement age and might be resistant to learning a new system and processes.
- Trading partners will experience a large change and learning curve in regards to the information they will need to report to VDOL (with the IAIABC EDI Claims upgrade from release 1 to release 3.1).
- The primary champion for the Project, the WC Director, is retiring on 12/31/2021.

This might lead to lack of adoption of the new solutions and slow/prevent achievement of Project goals/objectives.

State's Planned Risk Strategy:

- Mitigate
- Transfer
- Mitigate

State's Planned Risk Response:

- *Resistance to Change:* New project leads/champions (see below, *Champion* bullet) will provide weekly updates to the entire project team, starting at the new year. This will include project updates featuring project status and timeline, expected staff participation needs, advance training schedule, regular Q&A sessions, and more.
- *Trading Partners:* The State is transferring this part of the risk to Ebix, as it is part of the deliverables for their contract. Ebix will manage the trading partners through the upgrade and during M&O. They have a system that has been successfully used with several other states. Many trading partners have been through this process already.
- *Champion:* EPMO Project Manager and Program Manager have met with VDOL Commissioner to discuss both the Project Lead and Champion roles in the project. VDOL Commissioner is to meet with the new WC Director to discuss sharing the roles between the current WC Program Manager and the WC Voc Rehab Subject Matter Expert (SME). Both staff have been involved in all aspects of the project to date and are avid supporters of the project. Planning is underway to assess the project time needs for the two staff resources to identify the amount of backfill needed for regular (non-project related) duties.

Timing of Risk Response: Pre-Contract Execution (in progress).

Reviewer's Assessment of State's Planned Response: BerryDunn believes that identifying new change champions is an acceptable approach to assisting with OCM efforts. BerryDunn further recommends that the State consider leveraging the/a Project Manager resource to further plan, manage, and monitor OCM efforts—with a focus on creating feedback loops with Project stakeholders, monitoring Project buy-in/adoption, and addressing stakeholder resistance as it is identified.

Risk #: 3	Risk Likelihood/Probability: High	Risk Impact: Medium	Overall Risk Rating: Medium

Source of Risk: Interviews with the State

Risk Description: There is a current resource strain in regards to the Project's EA resource. State staff during stakeholder interviews stated that the EA has been unavailable at certain times when needed (due to other responsibilities) and that this might continue going forward. The lack of active engagement from the State's EA might lead to delays in the Project schedule as EAs are typically expected to review key deliverables and provide technical oversight throughout IT projects.

State's Planned Risk Strategy: Mitigation

State's Planned Risk Response: The State will be pursuing a contracted EA resource through the retainer pool for this Project to mitigate the resource availability risk.

Timing of Risk Response: Pre-Contract Execution

Reviewer's Assessment of State's Planned Response: The State's response is acceptable. The State might also consider allocating time for the previously assigned EA to assist with onboarding the contracted resource to further mitigate this risk.

Risk #: 4	Risk Likelihood/Probability: Medium	Risk Impact: High	Overall Risk Rating: Medium

Source of Risk: Interviews with the State and vendors, and document review

Risk Description: There does not appear to be clarity between the vendors and the State regarding the preferred tool and process expectations for requirements management and traceability. Absent a defined approach for requirements management and traceability, among two different solutions/vendors, might limit the State's visibility into whether or not the vendors' solutions have met the requirements, and might also lead to misaligned expectations regarding roles/responsibilities for requirements management and traceability.

State's Planned Risk Strategy: Mitigate

State's Planned Risk Response: The requirements for this project were collected in Azure DevOps (ADO). Both vendors will be required to use ADO for requirements management, including acceptance criteria, SOV sign-off, and test cases. Vendors will be provided state partner accounts and ADO licenses. State BA will help manage this process. See deliverables table in Section 6.1.1 of contracts for requirement to use ADO for deliverables: "Requirements Discovery Sessions" and "Test Cases & Results.

Timing of Risk Response: Pre-Contract Execution.

Reviewer's Assessment of State's Planned Response: The State's Planned Risk Response is acceptable.

Risk #:	Risk Likelihood/Probability:	Risk Impact:	Overall Risk Rating:
5	Medium	High	Medium

Source of Risk: Interviews with the State and vendors
Risk Description: There is only one State staff member (the vocational rehabilitation specialist) familiar with the EDI Solution/work and only one State staff member (the Certified System Administrator for OnBase) who will be engaged in development knowledge transfer with All Star (until a second Certified System Administrator for OnBase is on-boarded). If either of these resources become unavailable, for any reason, then there is no one to fill those roles for the State.
State's Planned Risk Strategy: • Accept (EDI) • Mitigate (OnBase Sys Admin)
State's Planned Risk Response: • *EDI:* The EDI technology solution currently in place is functioning, however it is not understood. The VR specialist knows if the necessary functions are working, but not how they work. There is very little EDI technology knowledge that is exclusive to this position and in the unexpected absence of this individual, the Program Manager is available with similar knowledge and skills. • *OnBase Sys Admin:* Two resources have been put forward to fill the second sys admin position. Once the IT Director decides on the resource, training will start in early 2022. Additionally, there are several other ADS OnBase Certified System Administrators that can be, and have been, made available to projects, if needed.
Timing of Risk Response: Pre-Contract Execution (not tied to contract).
Reviewer's Assessment of State's Planned Response: The State's Planned Risk Response is acceptable.

Risk #: 6	Risk Likelihood/Probability: Medium	Risk Impact: Medium	Overall Risk Rating: Medium

Source of Risk: Interview with vendor

Risk Description: The approach for providing All Star with access to necessary State systems is to partner them with a State liaison (i.e., proxy access) rather than providing All Star with VPN access. Limiting All Star's access might lead to unnecessary Project schedule delays, as scheduling time between the vendor staff and the State liaison might be difficult to coordinate based on their combined availability.

State's Planned Risk Strategy: Mitigate

State's Planned Risk Response: We will use a combination of MS Teams and Windows Virtual Desktop, with MS Teams as the first choice. VDOL-ADS IT Resource is 100% dedicated to this project and will be available off-hours as necessary. The preference is to connect with the VDOL-ADS resource in attendance, on the vendor's schedule, then leave them un-attended
as necessary depending on work being performed.

Timing of Risk Response: In progress.

Reviewer's Assessment of State's Planned Response: BerryDunn believes that the State's Planned Risk Response does not fully address the identified risk, as the VDOL-ADS IT resource might have other Project work to perform than providing All Star with proxy access to necessary State systems. Furthermore, providing proxy access in this manner is also likely not the most effective use of the VDOL-ADS IT resource.

Risk #: 7	Risk Likelihood/Probability: High	Risk Impact: Medium	Overall Risk Rating: Medium

Source of Risk: Interview with vendor

Risk Description: The State Project Manager is currently allocated eight hours per week to the Project, and is responsible for developing/monitoring/maintaining an integrated master Project schedule that covers both of the vendors' efforts—in addition to the other responsibilities (e.g., risk/issue management). Eight hours per week might not be enough time to effectively perform these duties.

State's Planned Risk Strategy: Mitigate

State's Planned Risk Response: The State Project Manager will be available for up to 15 hours per week starting in late March 2022. A formal Change Request for the increased allocation (an additional 450 hours or $39,600) has been drafted, pre-approved by current and incoming WC Directors, and is in DocuSign for execution. As is normal for an EPMO project manager, the Project Manager will have the discretion to allocate available hours as necessary during the project, with some weeks coming in well above the average 15 hours and many below that average.

Timing of Risk Response: Pre-contract (in progress now).

Reviewer's Assessment of State's Planned Response: The State's Planned Risk Response is acceptable.

Risk #:	Risk Likelihood/Probability:	Risk Impact:	Overall Risk Rating:
8	Low	Medium	Medium

Source of Risk: Interview with vendor

Risk Description: The two vendors will need to reach consensus on the timing of each of their testing and implementation activities and then coordinate the execution of those activities. This coordination could be difficult, which might delay contract execution, completion of an integrated master Project schedule, and/or the go-live date.

State's Planned Risk Strategy: Mitigate

State's Planned Risk Response: The team has already met twice with both vendors in attendance to discuss the schedule. The following decisions have already been made:

- The system integrations will be limited to transfer of data via SFTP XML files. This significantly reduces the amount of coordination needed during development.

- The system go-lives will be in concert, but the development timelines can move relatively freely on their own (due to the first bullet).

- The EDI timeline is very flexible and will flex to the needs of the OnBase go-live. The EDI work can be completed first and pause until OnBase is ready for integration testing and go-live.

The contracts will have coordinated schedules based on the new OnBase schedule delivered 12/22, the project manager has already sent that schedule to EDI vendor requesting any necessary updates to their IMS.

Timing of Risk Response: Pre- & Post-Contract Execution.

Reviewer's Assessment of State's Planned Response: The State's Planned Risk Response is acceptable.

Risk #: 9	Risk Likelihood/Probability: Low	Risk Impact: High	Overall Risk Rating: Medium
Source of Risk: Interview with the state			
Risk Description: The State has identified certain data quality issues within the current WC solution and requires the State to complete data cleansing activities prior to the commencement of data migration and conversion activities. The Project might be delayed if the State does not complete this work, or flawed data will be migrated into the new solution and will need to be cleaned later in the new solution.			
State's Planned Risk Strategy: Mitigate			
State's Planned Risk Response: The areas requiring the most data cleaning have already been identified: leading 0s in FIENs, SSN anomalies, and zip codes. All data eligible for migration will be reviewed prior to migration in a staging area in CSV format. The work will focus on identifying and correcting the records with errors that cannot be fixed in the current system. The data will be migrated from the corrected CSV files. This work will be completed in stages throughout the project with work assigned to staff and tracked by WC Program Manager.			
Timing of Risk Response: Post-Contract, Pre-Migration.			
Reviewer's Assessment of State's Planned Response: The State's Planned Risk Response is acceptable.			