



Paul Garstki Consulting

INDEPENDENT REVIEW
OF A PROPOSED
MABD SELF-SERVICE APPLICATION
PROJECT

*For the
State of Vermont
Agency of Digital Services (ADS)
And
Department of Vermont Health Access (DVHA)*

*Submitted to the
State of Vermont, Office of the CIO
by:*

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1 EXECUTIVE SUMMARY

Provide an introduction that includes a brief overview of the technology project and selected vendor(s) as well as any significant findings or conclusions. Ensure any significant findings or conclusions are supported by data in the report.

The proposed project engages a vendor to Design, Develop, and Implement (DDI) a Self-Service Application (SSAP) to enhance the ease by which a Vermonter can apply for Medicaid for the Aged, Blind and Disabled (MABD) or transition from Medicaid for Children and Adults (MCA). Currently, Vermonters can only submit an application for MABD through the mail (paper application), in person, or over the phone with assistance from call center staff (who use the existing Online Application Pilot). The self-service online application will open up all Medicaid application modalities (paper, in person, phone, online) to the target group, better serving Vermonters and enhancing federal Centers for Medicare & Medicaid (CMS) compliance.

The selected vendor (NAVA) is well qualified. The vendor's plan is detailed and very well organized. The vendor has previous experience with the State implementing two closely related projects (the Document Uploader and the Online Application Pilot).

The proposed SSAP builds up the existing Online Application Pilot and is completely integrated with the State's existing Medicaid Enterprise System (MES) and Customer Portal.

We find the project to be exceptionally well-staffed, architecturally sound, very well planned, cost-effective, and likely to succeed.

1.1 COST SUMMARY

Table 1 - Cost Summary

IT Activity Lifecycle:	5
Total Lifecycle Costs:	\$1,338,746.91
Total Implementation Costs:	\$1,101,406.60
New Annual Operating Costs:	\$47,468.06
Current Annual Operating Costs:	\$0.00
Difference Between Current and New Operating Costs:	\$47,468.06
Funding Source(s) and Percentage Breakdown if Multiple Sources:	Implementation: 67.6% Federal 32.4% State Operating: 71.11% Federal 28.89% State

1.2 DISPOSITION OF INDEPENDENT REVIEW DELIVERABLES

Table 2 - Disposition of Independent Review Deliverables

Deliverable	Highlights from the Review
<p>Acquisition Cost Assessment</p>	<p>Total Acquisition Costs are \$1,101,406.60, of which \$516,614.60 is for implementation services, \$567,023.00 is for State personnel, and \$17,769 for professional services.</p> <p>A tabular comparison of the vendor’s proposed labor rates in the area where the vendor is located plus vendor margin shows that the proposed price is reasonable.</p>
<p>Technology Architecture Review</p>	<p>The proposed MABD Self-Service Application (SSAP) is a relatively straightforward public-facing web-based interactive application allowing a user to fill out a Medicaid application and submit it for review and potential approval. The SSAP builds upon the existing Online Application Pilot and is housed in the existing State Medicaid Enterprise System (MES).</p> <p>The Architecture is clear and appropriate and aligns very well with the State’s IT Strategic Plan and with Enterprise Architectural Principles.</p> <p>We find that the high-level design, functional requirements, and proposed architecture are all appropriate, resilient, and consistent with existing State preferences and standards.</p>
<p>Implementation Plan Assessment</p>	<p>The vendor’s implementation plan is clear, logical, sufficiently detailed, aligned with State requirements and preferences, and, in our judgment, likely to succeed.</p> <p>The vendor proposes a 4-month schedule, effectively cutting the State’s original timeline in half. This carries some risk, but the benefits outweigh the risk, in our judgment.</p> <p>This project is exceptionally well-staffed. All relevant internal stakeholders are represented, and there is abundant knowledge of external stakeholders’ needs. Knowledge of the project is sufficiently dispersed in the team to obviate any risk of delay if a team member becomes unavailable for any reason. Confidence is high and professional relations are cordial. The addition of new modalities to the Medicaid application process will introduce some adjustments or additions to business</p>

processes. The team includes an Organizational Change Practitioner to address this need.

Cost Analysis and Model for Benefit Analysis

This project has a **tangible cost** to the State of **\$425,423.35**, And a **tangible benefit** to the State as FFP of **\$913,323.56**.

Intangible benefits are in the areas of CMS compliance, improved health access, customer service, accessibility, and projected cost avoidance over the project lifecycle of \$28,415.

In our assessment, the benefits greatly outweigh the costs.

Impact Analysis on Net Operating Costs

Over the project lifecycle, the average annual cost to the State is:

- **\$13,713.52.**

The implementation cost to the State is:

- **\$356,855.74.**

Federal funding is in the form of Federal Financial Participation (FFP). For this project,

- **FFP during procurement is 67.6%.** (State share is 32.4%)
- **FFP during M&O is 71.11%.** (State share is 28.89%)

This project represents a new build and does not replace any existing State systems. Consequently, there are no current costs being retired to offset new costs. There is no break-even point.

Analysis of Alternatives

Given the need for compliance, there are few alternatives to this project. The State does not have the capacity to effectively develop such an application “in-house,” and we assess that it is not in the State’s interest to build that capacity at this time.

Security Assessment

The proposed SSAP would be an integrated part of the State's Medicaid Enterprise System (MES) and accessed via the existing Customer Portal. The vendor is responsible for employing security best-practices in its development process, and for implementing an application that is robust and secure in itself, but the vendor is not responsible for the security of the MES as a whole. The MES is assessed for compliance with the CMS Minimum Acceptable Risk Standards for Exchanges (MARS-E).

Extensive and appropriate security risk management and testing is in place for this project. We have no concerns.

1.3 IDENTIFIED HIGH IMPACT &/OR HIGH LIKELIHOOD OF OCCURRENCE RISKS

NOTE: Throughout the narrative text of this document, **Risks and Issues are identified by bold red text**, and an accompanying tag (**RISK_ID#_0**) provides the Risk or Issue ID to reference the risk, response, and reference in the Risk Register.

The following table lists the risks identified as having high impact and/or high likelihood (probability) of occurrence.

Please see the **Risk & Issues Register, in Section 10**, for details.

Table 3 - Identified High Impact &/or High Likelihood of Occurrence Risks

Risk Description	RATING IMPACT/ PROB	State's Planned Risk Response	Reviewer's Assessment of Planned Response
<p>The SSAP deployment is dependent on successful completion of the Disaster Recovery project, which is running parallel to SSAP, though on a sooner target completion date. The SSAP project team has identified potential conflicts for resources while the DR project is underway and has adopted a risk response of "Watch" (which is not a standard PMBOK risk response) with a plan to monitor the situation and stay in close communication with the DR project. We agree this is generally the right approach at this time.</p>	<p>21 3/7</p>	<p>The state agrees with this assessment. The status of "Watch" is a standard status option within the ADS EPMO project management tool, however, the PM/PCO agree that we should utilize a status of "mitigate" on this particular risk considering the approach. Change has been completed.</p>	<p>Concur</p>
<p>The SSAP project team has related that Federal and State laws do not allow the State to require an SSN from an application filer who is not applying for Medicaid for themselves, and yet the underlying OnBase system uses SSNs for indexing. The project team is working diligently to find a solution to this problem. The current project risk log response is "Mitigate," but it looks more like a choice between "Avoid" and "Accept."</p>	<p>50 5/10</p>	<p>The state agrees that the response is "Avoid". The state will not require an application filer who is not applying for Medicaid to provide an SSN; the application filer will have the ability to skip over the question.</p>	<p>Concur</p>

1.4 OTHER KEY ISSUES

none

1.5 RECOMMENDATION

We recommend that this project proceed as currently planned.

1.6 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 me by the State.

Independent Reviewer Signature

Date

1.7 REPORT ACCEPTANCE

The electronic signatures below represent the acceptance of this document as the final completed Independent Review Report.

ADS Oversight Project Manager

Date

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 056, §3303(d):

2.1.1 THE AGENCY SHALL OBTAIN INDEPENDENT EXPERT REVIEW OF ANY NEW INFORMATION TECHNOLOGY PROJECTS WITH A TOTAL COST OF \$1,000,000.00 OR GREATER OR WHEN REQUIRED BY THE CHIEF INFORMATION OFFICER

2.1.2 THE INDEPENDENT REVIEW REPORT INCLUDES:

- A. An acquisition cost assessment;
- B. A technology architecture and standards review;
- C. An implementation plan assessment;
- D. A cost analysis and model for benefit analysis;
- E. An analysis of alternatives;
- F. An impact analysis on net operating costs for the Agency carrying out the activity; and
- G. A security assessment.

2.2 OUT-OF-SCOPE

- A separate deliverable contracted as part of this Independent Review may be procurement negotiation advisory services, but documentation related to those services are not part of this report.

3 SOURCES OF INFORMATION

3.1 INDEPENDENT REVIEW PARTICIPANTS

Table 4 - Independent Review Participants

(Notes: Participants' names may be duplicated if they were at more than one interview. The IT Project Manager and IT Project Coordinator attended all interviews. All interviews were teleconferences. The kickoff meeting is not included as an interview.)

Last Name	First Name	Title	Interview Topic	Interview date
Arumugam	Balaji	Business Analyst	Architecture	7/2/2021
Durell	Jacob	Enterprise Architect I	Architecture	7/2/2021
Willard	James	IT Manager II	Architecture	7/2/2021
Provost	Jonathan	ADS Procurement & Contracting (DVHA)	Project History and Procurement	7/6/2021
Richardson	Brittney	Benefits Program Administrator	Project History and Procurement	7/6/2021
Steventon	Rick	IE&E Program Director	Project History and Procurement	7/6/2021
Willard	James	IT Manager II	Project History and Procurement	7/6/2021
Zehnacker	Jonathan	IE&E Program Deputy Sponsor	Project History and Procurement	7/6/2021
Schels	Marcia	Deputy IT Director serving AHS	Project History and Procurement	7/6/2021
Hayward	Marie	Financial Director III	Costs and Funding	7/6/2021
Zehnacker	Jonathan	IE&E Program Deputy Sponsor	Costs and Funding	7/6/2021
Pratt	Paul	Interim DVHA Portfolio Manager	Costs and Funding	7/6/2021
Steventon	Rick	IE&E Program Director	Costs and Funding	7/6/2021
Wivell	Emily	AHS Information Security Director	Security	7/6/2021
Maille	Julia	Program Consultant	UAT Testing and 508 Compliance	7/8/2021
Richardson	Brittney	Benefits Program Administrator	UAT Testing and 508 Compliance	7/8/2021

Taylor	Renee	Quality Control (Testing Manager)	UAT Testing and 508 Compliance	7/8/2021
Carriveau	Chelsea	IT Project Manager	Project Mgt and Coordination	7/8/2021
Urban	Kacey	IT Project Coordinator	Project Mgt and Coordination	7/8/2021

3.2 INDEPENDENT REVIEW DOCUMENTATION

The following documents were used in the process and preparation of this Independent Review.

Table 5 - Independent Review Documents

Document	Source
ITABC_Data_Worksheet_CPP3_Self-Service	State
SSAP M&O Cost Workbook	State
SSAP Risk & Issue Log 20210629	State
SSAP_ Future State Activity Diagram	State
SSAP_Decision Log	State
SSAP_ITABC_v2 CIO Signed	State
SSAP_Project Charter_Signed	State
SSAP_Risk & Issue Log 20210706	State
SSAP_Scope Statement_Signed	State
SSAP_Stakeholder Register	State
DVHA Systems - Diagrammed Workflows Presentation 06212021 v1	State
System Design	State
Test Strategy-Plan_TEMPLATE_RT	State
UAT_SOP_V4	State
Proposals Vendor Scoring Workbook ADS DVHA MABD Self Service Portal Rebid	State
2 - MARS-E v2-0 Minimum Acceptable Risk Standards for Exchanges-11102015	State
W~Lori Collins~IEandE Program Update~12-11-2020	State
ADS DVHA MABD Self-Service Portal SOW RFP 26Apr2021 Re-Issue Final	State

MABD Self-Service Application Portal SOW RFP Re-Issue Technical Response	NAVA
MABD Self-Service Application Portal SOW RFP Re-Issue Financial Response	NAVA

4 PROJECT INFORMATION

4.1 HISTORICAL BACKGROUND

In 2020, the Department of Vermont Health Access (DVHA) Integrated Eligibility and Enrollment (IE&E) unit began phase II of the Customer Portal effort. In light of CMS compliance requirements, and to enhance service to Vermonters, the initial intent was to implement an online application for all Medicaid populations. Due to resource constraints and other reasons, this intent was re-configured to implement an Online Application Pilot to be used by call center staff to enable MABD applicants to apply by phone. That project was successfully implemented in the Fall of 2020 and led in turn to the present project.

A Request for Proposals (RFP) was issued by the State on April 26, 2021. The RFP Statement of Work (SOW) required proposed hours and rates for the following categories:

- Project Manager (25% allocation)
- IT Lead / Scrum Master
- Developer (s)
- UIX/UX Specialist
- Release Engineer

The SOW specified a maximum payable for the project of \$500,000. Five proposals were received, and after a careful scoring process, the State selected NAVA as the vendor.

4.2 PROJECT GOAL

Currently, Vermonters can only submit an application for Medicaid for the Aged, Blind and Disabled (MABD) through the mail (paper application) or in person. Through the MABD Online Application pilot, Vermonters now have the option to fill out this form over the phone with assistance from call center staff. To enhance the ease by which a Vermonter can apply for MABD and to meet Federal requirements by providing an online option, this project will make the MABD online application available for self-service for new applicants or enrollees transitioning from Medicaid for Children and Adults (MCA).

4.3 PROJECT SCOPE

4.3.1 IN-SCOPE

Several enhancements will be made to the existing MABD Online Application to help create a user-friendly experience for Vermont's MABD population as IE&E builds self-service capabilities.

The following features are to be designed, developed, and implemented by the selected vendor:

Table 6 - Project Features In-scope for Vendor

Feature	Description
Save and retrieve application	Customer must be able to save the application at any time and continue later.
Link to voter registration and WIC sites	Information about voter registration and a supplemental nutrition program for Women, Infants, and Children (WIC) must be provided to the customer from the online application.
Review before submitting	Customer must be able to review the application data in a single screen and complete a verification process before submitting.
Allow customer to complete application with missing information	Online application must allow the customer to submit the application even if they leave required fields blank.
Drop down list	Online application must provide a list of defined values for fields as appropriate.
Error handling	Log the errors during application submission, PDF generation and TIFF conversion, notify the Business users and applicant.
Transitioning population	Application questions need to be reviewed so the tool is appropriate for customers who have been on Medicaid for Children and Adults (MCA) but now need to be screened for MABD.
Customer authentication	Customer must be able to login to online application using Okta.
Reports	Business and Operations teams can get summary and detailed reports on the customer portal activities and performance.
Develop Admin Portal	Develop a portal for the business users (BASU) to view failure uploads to OnBase and resend those MABD application PDFs to OnBase.

The following items are to be implemented by State personnel:

Table 7 - Project Features In-scope for State personnel

Feature	Description
Link in VHC portal	Add the MABD online application link in the VHC portal.
Digital signature	Applicant and spouse must be able to sign the application digitally.
Domain name	Procure Secure Socket Layer (SSL) certificate and domain name.
Notice and form updates	Notices and the 205SUPP need to be updated to include the online self-service application option.

Phone pilot enhancements

Complete below opportunities for improvement with the MAXIMUS phone pilot for new applicants and transitioners.

- Memorialize phone conversation.
- Expanding phone processing to transitioners

4.3.2 OUT-OF-SCOPE

Features which have been deemed out-of-scope for the MABD online application include:

Feature	Description
Smart application question flow	Online application determines which questions should come next based on the customer's previous answer. Note: dynamic question flow in current product will be preserved.
Contact person	Add contact person in the application so that the Head of the Household (HOH) will be the same in Siebel and ACCESS.
Question flow for Katie Beckett case	The question flow must be clear for those applying for the Katie Beckett Medicaid program.
Single sign-on	Integrate VHC authentication with Okta so that customers can use the same account for VHC, Online Application, Uploader and ESD MyBenefits portals.
View HealthCare benefits	Like in VHC and ESD MyBenefits portals, customers must be able to view their benefits that they applied through the Online App.

4.3.3 MAJOR DELIVERABLES

Table 8 - Major Deliverables

Deliverables
Deliverable 0: Kickoff meeting
Deliverable 1: Customer authentication
Deliverable 2: Save and retrieve application
Deliverable 3: Link to voter registration and WIC sites
Deliverable 4: Drop down lists
Deliverable 5: Transitioning population
Deliverable 6: Allow customer to complete application with missing info
Deliverable 7: Review before submitting
Deliverable 8: Error handling
Deliverable 9: Reports
Deliverable 10: Develop Admin Portal
Deliverable 11: Security and compliance approvals
Deliverable 12: Readiness Checklist
Deliverable 13: Remove feature flags
Deliverable 14: Project Closeout Package

4.4 PROJECT PHASES, MILESTONES, AND SCHEDULE

Table 9 - Project Milestones

Project Milestone	Complete by Date
Initiate project by	3/16/2021
Procure solution vendor by	5/12/2021
DDI Milestone 1	8/31/2021
DDI Milestone 2	11/30/2021
DDI Milestone 3	12/31/2021
Operational Readiness	2/28/2022
Deployment to PROD environment	3/21/2022
Product Launch	4/1/2022
Project Closeout	4/30/2022

Note: Dates in the table above are as shown in the SSAP Project Charter at the time of this writing. The project team expects to adjust dates as appropriate once the selected vendor is formally engaged. We assess that the Project Closeout date will not be adjusted to any later than those shown above.

5 ACQUISITION COST ASSESSMENT

Table 10 - Acquisition Costs

Acquisition Costs	Cost	Comments
Hardware Costs	\$0.00	No hardware costs to State
Software Costs	\$0.00	No software costs to State
Implementation Services	\$516,614.60	Design, Development, Implementation AND Security Vendor services. See attach. 3, Cost Spreadsheet
State Personnel	\$567,023.00	See attach. 3, Cost Spreadsheet
Professional Services (e.g., Project Management, Technical, Training, etc.)	\$17,769.00	Independent Review
Total Acquisition Costs	\$1,101,406.60	

5.1 COST VALIDATION:

Describe how you validated the Acquisition Costs.

Implementation Services cost includes:

- The hourly rates and estimated effort hours proposed by the selected vendor for the provision of Design, Development, and Implementation (DDI) services. As required by the RFP, the vendor provided a breakdown by labor categories and associated hourly rates charged (see 5.2 below).
- Implementation security-related services provided by the State's Security Vendor to test the deployed application.

The State Personnel costs represent actual costs during procurement and estimated costs through implementation, using actual or standard State hourly rates by labor category for ADS, ADS

Contracted Labor, and AHS/DVHA personnel. These are multiplied by hours as a percentage of Full Time Equivalents (FTE). We examined these estimates in light of project planning for implementation and tasks during procurement and conclude that they are reasonable and realistic.

The Professional Services costs represent actual costs.

5.2 COST COMPARISON:

How do the above Acquisition Costs compare with others who have purchased similar solutions (i.e., is the State paying more, less or about the same)?

Table 11 - Cost Comparison

Vendor's Labor Category	Washington D.C. Avg. Sal.	Est. Fully Loaded	Hourly rate FTE	As outsource	Vendor's rate	Comparison
Senior Project Manager	\$125,420.00	\$163,046.00	\$78.39	\$156.78	\$150.38	96%
Senior Product Manager	\$120,381.00	\$156,495.30	\$75.24	\$150.48	\$150.38	100%
Senior Software Engineer	\$132,492.00	\$172,239.60	\$82.81	\$165.62	\$145.85	88%
Software Engineer	\$114,199.00	\$148,458.70	\$71.37	\$142.75	\$166.50	117%
Senior Interaction Designer	\$89,382.00	\$116,196.60	\$55.86	\$111.73	\$136.22	122%
Senior DevOps Engineer	\$133,899.00	\$174,068.70	\$83.69	\$167.37	\$158.61	95%
					Average:	103%

The table above shows our comparative analysis of the vendor's proposed rates by labor category.

Using Washington, D.C. average salaries (where the vendor's headquarters are located) we conclude that the vendor's stated hourly rates are about the same. The process was as follows:

1. We located the average Washington, D.C. salary for each of the labor categories exactly as listed by the vendor. These are unloaded base salaries.
2. We increased each of these salaries by 30% to simulate a fully loaded salary with benefits.
3. Dividing by (40 hours X 52 weeks) produced an hourly rate for a full-time equivalent (FTE).
4. We doubled this rate to approximate the profit margin of a development outsourcing firm.
5. This rate was compared to the vendor's listed rates to produce a percentage.

5.3 COST ASSESSMENT:

Are the Acquisition Costs valid and appropriate in your professional opinion? List any concerns or issues with the costs.

Yes. The vendor's proposed price is reasonable for the time and work needed to implement the Self-Service Application, as explained above. The State's personnel costs slightly exceed the vendor cost. In many IT acquisitions, this would seem unusual, but with the extensive privacy, security, reliability, compliance, and useability requirements of this project, those costs are not only reasonable but necessary to reduce risk.

Additional Comments on Acquisition Costs:

Having stated our conclusions above, we would add that it is common knowledge that in a seller's market (as mid- and upper-tier software development is, at this time), bidders will generally tend to propose hours and rates for a capped RFP that come to a total which is close to the cap amount. Regardless, we think the vendor's proposed team and work allocations are very strong.

6 TECHNOLOGY ARCHITECTURE REVIEW

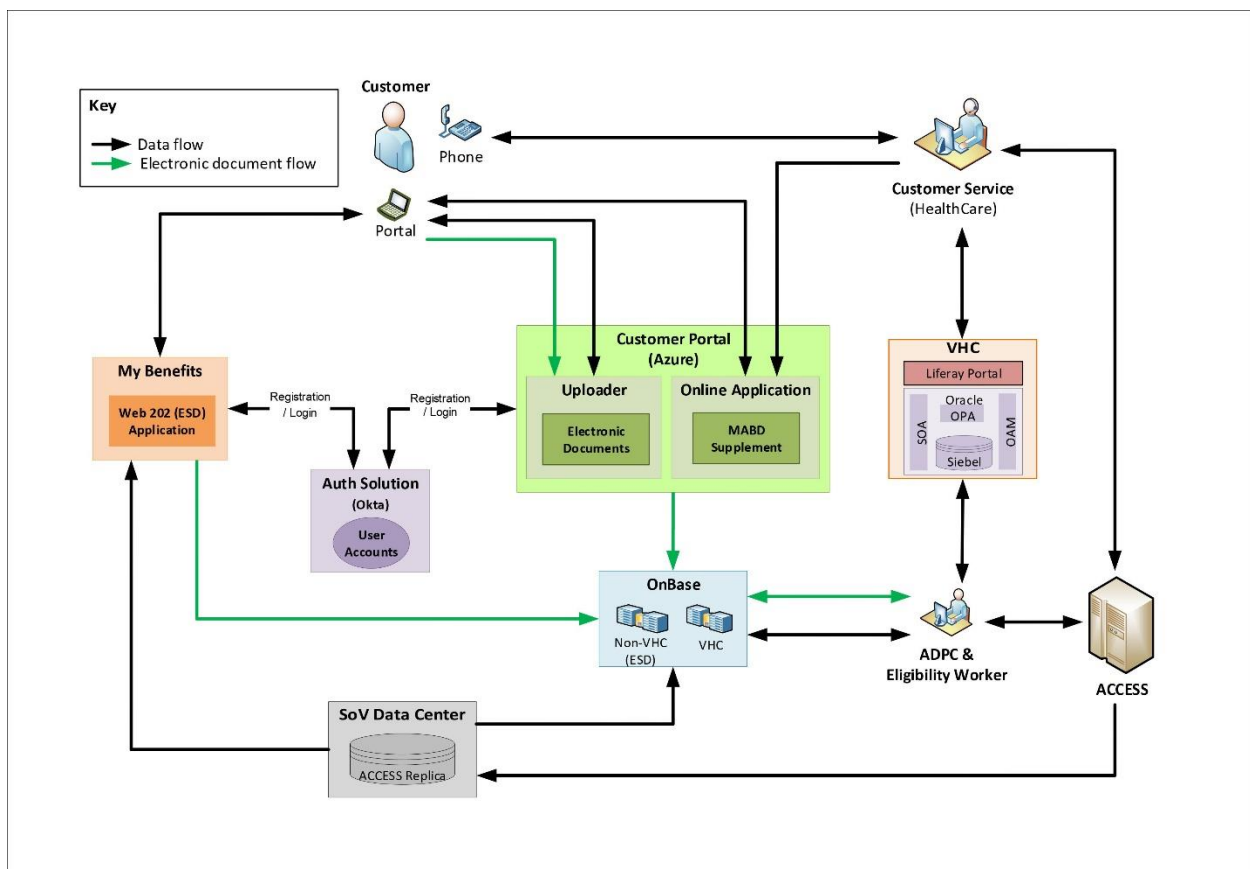
After performing an independent technology architecture review of the proposed solution, please respond to the following.

Note: In this review, the term “application” has two separate meanings:

- The web-based program this project proposes to implement.
- The form a potential Medicaid recipient fills out (whether on-line, by phone, by interview, etc.) to request enrollment.

When referring to the latter, we will use the term “Medicaid application.”

The proposed MABD Self-Service Application (SSAP) is a relatively straightforward public-facing web-based interactive application allowing a user to fill out a Medicaid application and submit it for review and potential approval. The State-provided high-level diagram below shows where this application sits in relation to the other related components of the Medicaid Enterprise System (MES) Integrated Eligibility and Enrollment (IE&E) system. The diagram box below titled “Online Application” contains the proposed SSAP.



The proposed SSAP builds upon and expands an existing application currently referred to as the “Online Application Pilot.” The Online Application Pilot allows call center staff (engaged via Maximus, Inc.) to use an online web application to assist Vermonters by phone in filing out a Medicaid application. The proposed SSAP expands this capability with self-service functionality.

The proposed SSAP would be accessed through the existing Vermont Customer Portal, which is hosted in Azure. A public user registers to create a user account. The account is created in an Okta Single Sign-On authentication solution, which allows access to any portal application with that one account.

The SSAP would allow applicants to save the information from a session and return to complete it at a later time. The Document Uploader (shown in the above diagram) is an existing application which allows applicants to upload documents required by the Medicaid application process. (Both the Online Application Pilot and the Document Uploader were designed and implemented by the selected vendor.)

The selected vendor proposes implementing the application using state-of-the-art tools familiar to State technical staff, such as the CMS Design System for User Interface design and Node.js for functionality. A more complete list of tools is listed in the vendor’s proposal and has been reviewed by the State Enterprise Architect.

When the self-service Medicaid application is submitted, the information entered into the proposed SSAP is transferred to the DVHA Health Access Eligibility and Enrollment Unit (HAEEU), who further evaluate and process the application, and may request further documentation etc. from the applicant.

The system is resilient: if the proposed SSAP malfunctions in some way, an error condition is reported to State staff, who will investigate and resolve the issue. If an applicant is frustrated in some way, the applicant can phone call center staff, who can continue the application process with the applicant, using the Online Application Pilot described above.

We find that the high-level design, functional requirements, and proposed architecture are all appropriate, resilient, and consistent with existing State preferences and standards.

6.1 STATE’S ENTERPRISE ARCHITECTURE GUIDING PRINCIPLES

6.1.1 A. ASSESS HOW WELL THE TECHNOLOGY SOLUTION ALIGNS WITH THE BUSINESS DIRECTION

The stated mission of DVHA is “to improve the health and well-being of Vermonters by providing access to quality healthcare cost effectively.” The proposed project aligns well with this mission. With an increasingly online-accessed world, and perhaps accelerated by the pandemic, the public in general has a cultural expectation that interactions with government – and indeed with health care entities – will be increasingly accessible through online means. Also, people with disabilities need access through a variety of modalities, and this application enhances accessibility through careful design and section 508

accessibility testing. The project holds the promise of enhancing the State’s internal application processing in some ways, which further supports the mission.

6.1.2 B. ASSESS HOW WELL THE TECHNOLOGY SOLUTION MAXIMIZES BENEFITS FOR THE STATE

The proposed architecture fits neatly into the existing Medicaid Enterprise System, minimizing changes needed for architecture or personnel processes. By maintaining compliance with federal Medicaid requirements, federal participation for further Information system development is made more likely.

6.1.3 C. ASSESS HOW WELL THE INFORMATION ARCHITECTURE OF THE TECHNOLOGY SOLUTION ADHERES TO THE PRINCIPLE OF INFORMATION IS AN ASSET

Although one motivation for this project is to maintain compliance with federal requirements, we point out that Vermont as a whole and DVHA in particular uses these requirements and the funding that supports them to support its own very strong internal mandates to provide health care that is high quality, affordable, and very widely accessible. For 15 years the State has pursued this goal, and during that time built a health care information system that is broadly based and interconnected to leverage information in pursuit of those goals. This project is a relatively small but significant part of that system.

6.1.4 D. ASSESS IF THE TECHNOLOGY SOLUTION WILL OPTIMIZE PROCESS

The solution will very likely optimize process, although this will have to be assessed after the online application has been in place for some time. The self-service nature of the application will probably save on some support personnel time that the State currently pays for (see **8.5 Intangible Costs and Benefits, below**). It builds upon and in many ways integrates with the document uploader and the (human-assisted) online application pilot. These connections should ensure a consistent process for the applicants and State personnel who process the applications, regardless of the application modality chosen by the applicant.

6.1.5 E. ASSESS HOW WELL THE TECHNOLOGY SOLUTION SUPPORTS RESILIENCE-DRIVEN SECURITY.

The application and the data it conveys employs and is situated within an architectural enterprise using a multi-layered security and privacy approach supporting a high level of availability, reliability, security, and privacy. Please see section **11 Security Assessment, below**, for a more in-depth discussion.

6.2 SUSTAINABILITY

The SSAP will use existing integration methods within the enterprise system to convey and retrieve data (such as from a saved in-process application). It will be built using tools and methods familiar to the State. After deployment, it will be hosted and managed as another component of the Customer Portal in Azure. Since it uses familiar tools and is well documented, it should be updateable and upgradeable

should the need arise, by any competent developer. As an integrated part of the managed Portal, it should be sustainable indefinitely.

6.3 HOW DOES THE SOLUTION COMPLY WITH THE ADS STRATEGIC GOALS ENUMERATED IN THE ADS STRATEGIC PLAN OF JANUARY 2020?

6.3.1 A. Leverage successes of others, learning best practices from outside Vermont.

Vermont participates in the Enterprise Medicaid Systems Community (MESC) through its membership in the New England States Consortium Systems Organization (NESCSO). The senior project leadership communicates frequently with their counterparts in other states, as well as with the CMS personnel. The vendor uses tools that reflect the state of the art, such as the CMS Design System, described above, and the 12 Factor App best practices approach to web application development.

6.3.2 B. Leverage shared services and cloud-based it, taking advantage of IT economies of scale.

The proposed SSAP is natively cloud-hosted in Azure, and part of the MES, which is similarly cloud based and shared among diverse applications.

6.3.3 C. Adapt the Vermont workforce to the evolving needs of state government.

The proposed SSAP continues the move toward self-service styled applications for public use, automating some processes and freeing State personnel for more focused work.

6.3.4 D. Apply enterprise architecture principles to drive digital transformation based on business needs.

The ADS Enterprise Architecture division was engaged in the development of requirements and subsequent proposal scoring for this project. EA and IT oversight will continue throughout the implementation and is accounted for in project costs for the solution as it moves forward through the lifecycle.

6.3.5 E. Couple it with business process optimization, to improve overall productivity and customer service.

The project team includes business analysis services. Processes for this solution and supporting and/or integrating processes analyzed, diagrammed, and documented in the SSAP Future State Diagram. We find this analysis to be clear, comprehensive, and logically rigorous. The processes diagrammed reflect current business processes and requirements.

6.3.6 F. Optimize IT investments via sound project management.

Please see **Section 7.4, below**.

6.3.7 G. Manage data commensurate with risk.

The MES is compliant with all CMS/federal, State, and Industry security standards, and requires attested compliance from its contracted IT vendors.

6.3.8 H. Incorporate metrics to measure outcomes.

The Project Charter at the time of this writing lists the following 5 project goals, each with associated measures.

#	Goal	Measure
1	At the completion of the project, Vermonters can apply for MABD benefits online 24/7 as well as over the phone during business hours. Adding the online modality and increasing the availability of the phone option to all applicants brings us into compliance by offering all four application modalities.	Online application available 24/7
2	At least 20% of applicable MABD applications are submitted online within 6 months of implementation.	% of applicants applying via phone % of applicants applying via paper % of applicants applying via Online App
3	The MABD self-service online application abandonment rate is less than 10% post implementation.	# of applications abandoned # of applications submitted
4	Obtain customer satisfaction rating of 4 or greater (using Likert scale) for the MABD self-service online application within 6 months of implementation.	Likert Scale: (1) Strongly disagree; (2) Disagree; (3) Neither agree nor disagree; (4) Agree; (5) Strongly agree
5	The percent of MABD online applications submitted with complete information (and do not require follow up) is greater than 75% post implementation.	# Applications submitted with complete Information # Applications submitted

We find these goals to be realistic and the measures appropriate, as long as the listed metrics are available and baselined before the project fully implemented.

6.4 COMPLIANCE WITH THE SECTION 508 AMENDMENT TO THE REHABILITATION ACT OF 1973, AS AMENDED IN 1998

Vermont.gov has adopted Section 508 and W3C Web Accessibility Initiative standards and guidelines as the benchmark to meet the objectives of the Universal Accessibility for State Web sites policy. This means that Vermont.gov website policy is exactly aligned with federal standards. In the present review,

we use “508 compliance” to mean both Vermont.gov policy and federal standards and guidelines for website accessibility.

The vendor will use an open-source interface design tool developed by CMS, called the “CMS Design System.” This tool is specifically designed to incorporate 508 compliance as a website is developed, along with other design feature. 508 compliance for this project once it is developed is tested and confirmed by a specialist team within AHS that works in conjunction with the User Acceptance Testing protocol as described in **Section 7.3.3.C, below**.

508 compliance is required of all Vermont.gov and Medicaid-related websites. We find the AHS process to be fully rigorous.

6.5 DISASTER RECOVERY

The proposed project is dependent upon a separate but somewhat parallel project known casually as “Disaster Recovery.” That project aims to provide recovery and continuity for the Customer Portal in Azure, by provided a failover mechanism from the portal as hosted in one Azure datacenter to an alternative, geographically disparate Azure datacenter, within a short and specified timeframe, should the primary site fail.

Because the proposed SSAP is dependent on the Disaster Recovery project successfully completing before the SSAP goes live to the public, there is a possibility that deployment of the SSAP could be delayed, should the Disaster Recovery project not complete successfully before the March 2022 go-live date for the SSAP. The DR project is scheduled to complete by December 31 of 2021. We are informed unofficially that the Disaster Recovery project is on schedule to complete by then and potentially earlier.

Please see **7.1 Reality of the Implementation Timetable, below**, for more on this topic.

6.6 DATA RETENTION

The project as proposed in not in itself a database, although it serves as a data source providing information which is further reviewed and processed by State personnel and stored within the larger MES, which stores data in compliance with all Federal and State retention requirements.

On a more surface level, the project as proposed implements a “save and return” feature, so that applicants can save an in-process application and return to continue it at a later time. This data is retained until it is ready for further processing, as described above.

6.7 SERVICE LEVEL AGREEMENT

6.7.1 WHAT ARE THE POST IMPLEMENTATION SERVICES AND SERVICE LEVELS REQUIRED BY THE STATE?

The vendor will be engaged only to design, develop, and implement the solution. After the solution is delivered and accepted by the State, no post-implementation services by the selected vendor are in-scope for this project.

(M&O support will continue to be provided by Competitive Computing (C2) after implementation, under a separate contract.)

6.7.2 IS THE VENDOR PROPOSED SERVICE LEVEL AGREEMENT ADEQUATE TO MEET THOSE NEEDS IN YOUR JUDGMENT?

N/A

6.8 SYSTEM INTEGRATION

6.8.1 IS THE DATA EXPORT REPORTING CAPABILITY OF THE PROPOSED SOLUTION CONSUMABLE BY THE STATE?

The SSAP portal will be designed from the outset to provide Medicaid application data in the format the State specifies.

6.8.2 WHAT DATA IS EXCHANGED AND WHAT SYSTEMS (STATE AND NON-STATE) WILL THE SOLUTION INTEGRATE/INTERFACE WITH?

The proposed SSAP is a data source for the MES, capturing applicant-provided responses to Medicaid application question items. The captured information is used by the HAEEU team to further evaluate and process the application. Accepted and appropriate information is recorded in the MES. The SSAP does not integrate/interface directly with any non-State systems.

Additional Comments on Architecture:

The SSAP project team has related that Federal and State laws do not allow the State to require an SSN from an application filer who is not applying for Medicaid for themselves, and yet the underlying OnBase system uses SSNs for indexing. We identified this as a risk **RISK_ID#_R3**. The project team is working diligently to find a solution to this problem. The current project risk log response as we received it proposed a strategy of "Mitigate," but it looked more like a choice between "Avoid" and "Accept."

The State commented that:

The state is not looking to be out of compliance rather just a compromise with the business side to reduce the amount of applications that would fall into this.

That does clarify the situation. In response to the risk assessment, the State replied:

The state agrees that the response is "Avoid". The state will not require an application filer who is not applying for Medicaid to provide an SSN; the application filer will have the ability to skip over the question.

The State explained further:

The state is reviewing the order of application questions to ensure that the chosen 'contact person' on the application is a person of the household and if the chosen 'contact person' is the not applying filer who did not provide an SSN, the state will use a temp SSN to complete the indexing process. Unique Okta ID will also help to allow proper indexing.

We assess this to be a well-reasoned and efficient resolution of the issue.

7 ASSESSMENT OF IMPLEMENTATION PLAN

The State's functional requirements as per the RFP require the vendor to implement 10 specific portal features and to present a workplan for design, development, and implementation (DDI). The selected vendor employs an Agile DDI methodology, producing deliverables in a series of sprints. Working from the required features list, the vendor allocated features among the 3 required DDI Milestones in a logical manner. They defined deliverables related to these and other milestones, in two cases proposing additional deliverables (*with asterisk in the list below*).

Milestone 1: Kickoff and DDI Milestone 1

Deliverable 0: Kickoff meeting

Deliverable 1: Customer authentication

Task 1.1: Recurring research and design tasks

Task 1.2: Recurring development tasks

Deliverable 2: Save and retrieve application.

Task 2.1: Recurring research and design tasks

Task 2.2: Recurring development tasks

Deliverable 3: Link to voter registration and WIC sites

Task 3.1: Recurring research and design tasks

Task 3.2: Recurring development tasks

Milestone 2: DDI Milestone 2

Deliverable 4: Drop down lists.

Task 4.1: Recurring research and design tasks

Task 4.2: Recurring development tasks

Deliverable 5: Transitioning population

Task 5.1: Recurring research and design tasks

Task 5.2: Recurring development tasks

Deliverable 6: Allow customer to complete application with missing info.

Task 6.1: Recurring research and design tasks

Task 6.2: Recurring development tasks

Milestone 3: DDI Milestone 3

Deliverable 7: Review before submitting

Task 7.1: Recurring research and design tasks

Task 7.2: Recurring development tasks

Deliverable 8: Error handling

Task 8.1: Recurring research and design tasks

Task 8.2: Recurring development tasks

Deliverable 9: Reports

Task 9.1: Recurring research and design tasks

Task 9.2: Recurring development tasks

Deliverable 10: Develop Admin Portal

Task 10.1: Recurring research and design tasks

Task 10.2: Recurring development tasks

Milestone 4: Operational Readiness

Deliverable 11: Security and compliance approvals*

Deliverable 12: Readiness Checklist*

Milestone 5: Deployment to PROD environment

Milestone 6: Product Launch

Deliverable 13: Remove feature flags.

Milestone 7: Project Closeout

Deliverable 14: Project Closeout Package

Task 14.1: Knowledge Transfer

Task 14.2: Create Project Closeout Package

The vendor’s sequencing of deliverables, with the associated grouping into the 3 DDI milestones, is well-paced and arranged in a manner that should dovetail well with the State’s User Acceptance Testing (UAT). Although the DDI methodology is pure Agile, the arrangement as shown above gives the plan the flavor of a Waterfall/Agile hybrid model. This aligns well with the State side of the project, where there are varying degrees of formal training in Agile methodology, although we found widespread comfort and general familiarity with the process. In addition, several State project team members have had experience working with the vendor on two previous projects.

The vendor’s proposed project team is experienced and appropriate. The vendor’s proposed hours and rates table maps the State’s defined roles from the RFP to labor categories, which helps in understanding the proposed labor rates. Two of the roles (Project Manager and IT Lead/Scrum Master) are combined by the vendor in one individual. The vendor’s explanation for this is reasonable and we think it is a fine decision for this project.

The vendor’s proposed timetable is accelerated compared to that proposed by the State, and we consider this in **Section 7.1, below**.

Overall, we find the implementation plan to be reasonable, logical, well-explained, and likely to succeed as intended.

After assessing the Implementation Plan, please comment on each of the following.

7.1 THE REALITY OF THE IMPLEMENTATION TIMETABLE

The vendor has proposed an accelerated timetable, compressing the 8-month timeline as laid out in the RFP to a 4-month timeline. This has both benefits and risks, although we assess the benefits as sufficiently outweighing the risks.

The vendor points to previous knowledge of the base application (the Online Application Pilot) and states that they allocate 60% of project time to their software development team of a Release Engineer and two developers. State project team members who have previous experience with the vendor told us that they have confidence that the vendor can perform in this timeframe.

The primary benefit is the potential 4-month “buffer” between the deployment of the SSAP and the State’s desired “deadline” date. This increases the State’s confidence in meeting their calendar goal and also provides some potential room for further development, in the event that the State desires additional functionality or other changes to the SSAP.

The table below, provided by the vendor, maps the RFP timeline to the vendor’s proposed timeline.

Activity	RFP Complete by Date	Vendor’s Proposed Start	Vendor’s Proposed Completion
Milestone 1: DDI Milestone 1	8/31/2021	8/16/2021	9/24/2021
Milestone 2: DDI Milestone 2	11/30/2021	9/27/2021	10/22/2021
Milestone 3: DDI Milestone 3	12/31/2021	10/25/2021	11/19/2021
Milestone 4: Operational Readiness	2/28/2022	11/8/2021	11/19/2021
Milestone 5: Deployment to PROD environment	3/21/2022	11/22/2021	12/3/2021
Milestone 6: Product Launch	4/1/2022	11/22/2021	12/10/2021
Milestone 7: Project Closeout	4/30/2022	11/22/2021	12/10/2021

The SSAP deployment is dependent on successful completion of the Disaster Recovery project, which is running parallel to SSAP, though on a sooner target completion date. We identify this as a risk **RISK_ID#_R1**. The SSAP project team has identified potential conflicts for resources while the DR project is underway and has adopted a risk response of "Watch" (which is not a standard PMBOK risk response) with a plan to monitor the situation and stay in close communication with the DR project. We agree this is generally the right approach at this time.

In response, to this risk, the State writes:

The state agrees with this assessment. The status of "Watch" is a standard status option within the ADS EPMO project management tool, however, the PM/PCO agree that we should utilize a status of "mitigate" on this particular risk considering the approach. Change has been completed.

The State project team, while excellently staffed, is functionally diverse and have many demands on their time. The vendor's proposed accelerated 4-month schedule has many benefits but could have delays if State staff are not available when needed. We identify this as a risk **RISK_ID#_R2**. The project management team is extremely diligent and effective in moving this project along.

In response, to this risk, the State writes:

The state agrees with this assessment and will continue to mitigate this risk. The project team is adequately staffed but will face potential delays if enough state personnel are not available at key times in the scheduled work. The PM is planning to connect with the technical vendor as soon as

possible to confirm the project schedule with key milestones, releases, and resource requirements to ensure we are appropriately staffed at critical project junctures. In addition, ADS/DVHA management is in the process of hiring two IT leads who will help fill the existing personnel gap and provide flexibility among IT management team members, which should help mitigate this risk. Finally, an initial project RACI has been developed and will be more fully fleshed out and distributed to the team once the technical vendor is onboard.

7.2 READINESS OF IMPACTED DIVISIONS/ DEPARTMENTS TO PARTICIPATE IN THIS SOLUTION/PROJECT

(Consider current culture, staff buy-in, organizational changes needed, and leadership readiness).

This project is exceptionally well-staffed. All relevant internal stakeholders are represented, and there is abundant knowledge of external stakeholders' needs. Knowledge of the project is sufficiently dispersed in the team to obviate any risk of delay if a team member becomes unavailable for any reason. Confidence is high and professional relations are cordial. The addition of new modalities to the Medicaid application process will introduce some adjustments or additions to business processes. The team includes an Organizational Change Practitioner to address this need.

7.3 DO THE MILESTONES AND DELIVERABLES PROPOSED BY THE VENDOR PROVIDE ENOUGH DETAIL TO HOLD THEM ACCOUNTABLE FOR MEETING THE BUSINESS NEEDS IN THESE AREAS:

7.3.1 A. PROJECT MANAGEMENT

The vendor's Project Manager and IT Lead/Scrum Master is a Certified Scaled Agile Framework Practitioner (CP). This certification is the appropriate one for the leader of a development team such as proposed. The same individual has appropriate experience leading similar projects with a healthcare focus, at the federal level and with the State.

7.3.2 B. TRAINING

Training is not in-scope for this project.

7.3.3 C. TESTING

Testing is largely the responsibility of the State for this project. We viewed the States' MMIS Care Management Project User Acceptance Testing Standard Operating Procedures and testing template and interviewed key members of the testing team. We found their approach to be comprehensive and rigorous. The 508 compliance (accessibility) tester is integrated with this team and is familiar with the related tools used by the vendor in development. The State tests for *Correctness, Integrity, Maintainability, and Performance and Availability* through a carefully vetted standardized process.

In the Agile development process used by the vendor, features are continually deployed as they are produced by each sprint. The State’s testing team works “one sprint behind:” i.e., they will test Sprint 1 when Sprint 2 is underway, etc. Like the Agile process itself, the testing process relies in part on User Stories. The project's testing team reported that in some past projects, getting User Stories of adequate quality to convert into test criteria was sometimes problematic. The Agile development nature of this project will require User Stories of sufficient quality early, often, and on time. We identify this as a risk **RISK_ID# _R5_**.

The State’s response to this risk was as follows:

The state agrees with this assessment. The QC Test Manager recommends including the QA testing team during User Story and Acceptance Criteria creation to ensure that User Stories are clear enough to draft test cases during each development sprint for execution in the following sprint without delay.

We concur with this response.

The vendor has proposed an additional deliverable called a Readiness Checklist, which is in some ways a testing function, and related to the products of the State’s testing protocol. The vendor describes it:

A Readiness Checklist is a tool to assess readiness for a release’s promotion to the production environment. It has six sections: Service Reliability, Cost Optimization, Compliance, Engagement, Release Planning, and Stakeholder Sign-off. Each section contains a number of readiness criteria specific to that section. The Readiness Checklist is tailored to meet the needs of each project. We will customize the Checklist for the MABD Self-service Application Portal and complete the readiness assessment.

This seems to us a good and thoughtful procedure.

7.3.4 D. DESIGN

The vendor proposes to use two qualified and experienced Agile developers and a properly qualified and experience User Interface designer. The tools employed (including the CMS Design System) are familiar to the State, congruent with those used in previous projects, and likely to support a result that meets all requirements.

7.3.5 E. CONVERSION (IF APPLICABLE)

N/A

7.3.6 F. IMPLEMENTATION PLANNING

The Agile software development process relies on a cyclic process of research, design, and development that ties specific business and user needs to design, implement, and test features throughout the course

of the project. It relies on the development of User Stories (see **7.3.3, above**) to implement functionality in an incremental manner. Consequently, implementation planning is a continuous process in this methodology. The vendor is very experienced in this development process. We have no concerns.

7.3.7 G. IMPLEMENTATION

In the vendor's Agile approach, features are continually deployed to the production environment as they are developed (as opposed to developing in a separate environment and deploying to production when the project is ready to go-live). The features are hidden from public availability but are available to be tested as described above. This reduces the risk of deploying and testing everything at once at the end of a project. This is normal practice in Agile projects of this type. We have no concerns.

7.4 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?

The State engages a project manager and a project coordinator for this effort. We found them individually and as a team to be very competent, responsive, very knowledgeable about the project, and able to move action items along quickly. They are comfortable with the Agile development process. They are good at dividing functions according to their roles and the project team as a whole has respect for them. We have no concerns about either of them.

Additional Comments on Implementation Plan:

none

8 COST ANALYSIS AND MODEL FOR BENEFIT ANALYSIS

8.1 ANALYSIS DESCRIPTION:

Provide a narrative summary of the cost benefit analysis conducted.

The proposed project provides new opportunities for Vermont citizens applying for Medicaid for the Aged, Blind and Disabled in the form of self-service capability and accessibility. It also assures continued compliance with CMS rules. It augments existing business processes, but it does not replace existing systems. As there are no current costs being replaced, there are no tangible benefits in the form of cost savings. (There is the opportunity for a relatively small amount of cost avoidance, which is considered an intangible benefit.)

Federal Financial Participation (FFP) in this project is significant, and we judge that participation to be a tangible benefit to the State.

The rest of the benefit analysis is entirely of the intangible sort. (See **6.3.8, above**, for a list of metrics that can measure the project's success.)

The cost analysis sums the acquisition (implementation) costs and the ongoing Maintenance and Operations (O&M) costs over the lifecycle of the project (5 years).

8.2 ASSUMPTIONS:

List any assumptions made in your analysis.

- That the costs to the DDI vendor will be exactly as estimated by the vendor.
- That the costs to the security vendor will be as the State has estimated.
- That the personnel costs to the project will be as estimated. Some internal State personnel costs are based on standard hourly rates that the State uses for estimates.
- That the percentage of FFP for project procurement and for project M&O are as reported by the State.

8.3 FUNDING:

Provide the funding source(s). If multiple sources, indicate the percentage of each source for both Acquisition Costs and on-going Operational costs over the duration of the system/service lifecycle.

Table 12 - Acquisition Costs - State and Federal Share

	%	Total
Federal	67.60%	\$744,550.86
State	32.40%	\$356,855.74
Total		\$1,101,406.60

Table 13 - M&O Costs - State and Federal Share

		FY1	FY2	FY3	FY4	FY5	Total
Federal	71.11%	\$9,947.58	\$39,688.20	\$39,700.09	\$39,712.23	\$39,724.60	\$168,773.41
State	28.89%	\$4,041.42	\$16,124.20	\$16,129.04	\$16,133.96	\$16,138.99	\$68,567.90
Total		\$13,989.00	\$55,812.40	\$55,829.13	\$55,846.19	\$55,863.59	\$237,340.31

8.4 TANGIBLE COSTS & BENEFITS:

Provide a list and description of the tangible costs and benefits of this project. Its “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.

- **Cost to the State:** **\$425,423.35**
 - **Benefit to the State as FFP:** **\$913,323.56**
- (Project lifecycle total is \$1,338,746.91)

8.5 INTANGIBLE COSTS & BENEFITS:

Provide a list and descriptions of the intangible costs and benefits. Its “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).

- Benefit: Cost Avoidance: \$28,415**

The State estimates that 10 applications per month that are currently done via phone could be done entirely online by Vermonters. This would be 120 applications per year. Applications via phone take approximately 45 minutes = 5,400 minutes/year not conducted via phone. The State pays \$1.053 per minute to Maximus for this Call Center support. $\$1.053 \times 5,400 = \$5,686$ /year cost avoidance.
- Benefit: Health Access and Customer Service**

To enhance the ease by which a Vermonter can apply for MABD and to meet Federal requirements by providing an online option, this project will make the MABD online application available for self-service for new applicants or enrollees transitioning from Medicaid for Children and Adults (MCA).
- Benefit: Customer Service**

The self-service MABD application portal will be available 24x7.
- Benefit: Accessibility**

Like all other State web sites, this portal will be Section 508-compliant.
- Benefit: Time-efficient Development**

The decision to choose the selected vendor resulted in an accelerated proposed timeline, cutting the State's implementation estimate in half.

8.6 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.

Yes, very much so: DVHA was created to improve the health and well-being of Vermonters by providing access to quality health care cost effectively. This project advances that goal and does so in a cost-effective and efficient manner.

8.7 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 lifecycle that was used appropriate for the technology being proposed? If not, please explain.

The goals and business value statements for this project, as put forth in the IT ABC form, are entirely consistent with the project as it currently stands.

The IT ABC form contained a few financial mis-estimations of Current Costs, which together resulted in an understatement of estimated Net Impact to State Costs. Although these were due to honest misunderstanding of IT ABC current cost entries, and in one case a decimal point error, they did result in an IT ABC form which estimated a net cost *savings* to the State of \$15,740.29 over the project lifecycle, while our estimate for the present Review shows a net *cost* to the State of \$425,423.35. (The errors will be corrected in an updated IT ABC form for this project). This was surprising to us in a project that has such high attention to detail in all other aspects we reviewed.

Our discussion with the project team convinces us that this is not a risk to the proposed project *per se*. Nonetheless, we think the IT ABC form is an important record of a State IT project as it is originally conceived and approved, as shown by the fact that it is included as a comparison point in the template for this Independent Review.

Additional Comments on the Cost Benefit Analysis:

none

9 ANALYSIS OF ALTERNATIVES

Given the need for compliance with CMS standards, which is in the best interest of the State, there are no substantially different acceptable alternatives to this project.

9.1 PROVIDE A BRIEF ANALYSIS OF ALTERNATE TECHNICAL SOLUTIONS THAT WERE DEEMED FINANCIALLY UNFEASIBLE.

The project has a vendor price cap of \$500,000.00 as put forth in the RFP. Any compliant proposal would be under this cap, so no alternate solutions were deemed unfeasible for financial reasons.

9.2 PROVIDE A BRIEF ANALYSIS OF ALTERNATE TECHNICAL SOLUTIONS THAT WERE DEEMED UNSUSTAINABLE.

It is unsustainable for the State to attempt to design, develop, and implement the SSAP using entirely “in-house” development resources. At the time the IT ABC form for this project was completed, this approach was under consideration. Although a very large state might have such a capacity, Vermont does not have the required number of State staff with appropriate skills and experience, nor do we assess it would it be advisable at this time to attempt to build such capacity.

9.3 PROVIDE A BRIEF ANALYSIS OF ALTERNATE TECHNICAL SOLUTIONS WHERE THE COSTS FOR OPERATIONS AND MAINTENANCE WERE UNFEASIBLE.

None.

10 IMPACT ANALYSIS ON NET OPERATING COSTS

10.1 INSERT A TABLE TO ILLUSTRATE THE NET OPERATING COST IMPACT.

Table 14 - Net Operating Cost Impact

	Procurement	FY1	FY2	FY3	FY4	FY5	Total
Federal Share	\$744,550.86	\$9,947.58	\$39,688.20	\$39,700.09	\$39,712.23	\$39,724.60	\$913,323.56
State Share	\$356,855.74	\$4,041.42	\$16,124.20	\$16,129.04	\$16,133.96	\$16,138.99	\$425,423.35
Total Project Cost	\$1,101,406.60	\$13,989.00	\$55,812.40	\$55,829.13	\$55,846.19	\$55,863.59	\$1,338,746.91

10.2 PROVIDE A NARRATIVE SUMMARY OF THE ANALYSIS CONDUCTED AND INCLUDE A LIST OF ANY ASSUMPTIONS.

The table above is similar to the table in the Cost/Benefit analysis (see **8.3, above**), except that here the entire lifecycle is totaled. Assumptions are the same as listed in **8.2, above**.

10.3 EXPLAIN ANY NET OPERATING INCREASES THAT WILL BE COVERED BY FEDERAL FUNDING. WILL THIS FUNDING COVER THE ENTIRE LIFECYCLE? IF NOT, PLEASE PROVIDE THE BREAKOUTS BY YEAR.

Please see the table in **10.1, above**. Federal funding is in the form of Federal Financial Participation (FFP). For this project,

- FFP during procurement is 67.6%. (State share is 323.4%)
- FFP during M&O is 71.11%. (State share is 28.89%)

The State Share row shows the cost impact of the project for the State.

Over the project lifecycle, the average annual cost to the State is \$13,713.52.

The implementation cost to the State is \$356,855.74.

10.4 WHAT IS THE BREAK-EVEN POINT FOR THIS IT ACTIVITY (CONSIDERING IMPLEMENTATION AND ON-GOING OPERATING COSTS)?

This project represents a new build and does not replace any existing State systems. Consequently, there are no current costs being retired to offset new costs. There is no break-even point.

11 SECURITY ASSESSMENT

Assess Information Security alignment with State expectations. ADS-Security Division will support reviewer and provide guidance on assessment.

The proposed SSAP would be an integrated part of the State's Medicaid Enterprise System (MES) and accessed via the existing Customer Portal. The vendor is responsible for employing security best-practices in its development process, and for implementing an application that is robust and secure in itself, but the vendor is not responsible for the security of the MES as a whole. The MES is assessed for compliance with the CMS Minimum Acceptable Risk Standards for Exchanges (MARS-E).

The State assigned a Security Analyst to this project. She assessed the project through its definition and procurement phase and will continue to do so during implementation and deployment. She has helpfully provided guidance on the questions listed below.

The State engages a "Security Vendor" (NuHarbor Security Inc.) to perform security risk assessment, application code security scan, and penetration testing for the SSAP when it is deployed. These services are included in the cost of the proposed project.

The vendor has proposed a deliverable for Security and Compliance Approvals. They propose to

"...work closely with the State's information security team throughout the project to ensure a streamlined security approval process. Throughout the project, we'll set up recurring check-ins with the State's Information Security Analyst to coordinate any necessary updates to security documentation, and to address any security concerns prior to considering a feature complete."

This sounds like a very good approach. We have no concerns with security or privacy in the proposed project.

11.1 WILL THE NEW SYSTEM HAVE ITS OWN INFORMATION SECURITY CONTROLS, RELY ON THE STATE'S CONTROLS, OR INCORPORATE BOTH?

Both, controls are implemented at the application level based on SOV policies. This is appropriate.

11.2 WHAT METHOD DOES THE SYSTEM USE FOR DATA CLASSIFICATION?

The MES uses compliance standards for classifying data, such as Personally Identifiable Information (PII), Protected Health Information (PHI), or Federal Tax Information (FTI). The proposed SSAP primarily carries PII, although other type of classification may apply as well.

11.3 WHAT IS THE VENDOR'S BREACH NOTIFICATION AND INCIDENT RESPONSE PROCESS?

This is not likely to be a vendor responsibility in the proposed project; however, the contract will include any related requirements as part of Attachment D: Standard Provisions for Information Technology Contracts.

11.4 DOES THE VENDOR HAVE A RISK MANAGEMENT PROGRAM THAT SPECIFICALLY ADDRESSES INFORMATION SECURITY RISKS?

The SSAP will be incorporated into the IE&E annual risk assessment and risk register, which specifically addresses information security risks.

11.5 WHAT ENCRYPTION CONTROLS/TECHNOLOGIES DOES THE SYSTEM USE TO PROTECT DATA AT REST AND IN TRANSIT?

This is covered by Azure hosting environment, employing AES 256-bit encryption meeting FIPS 140-2.

11.6 WHAT FORMAT DOES THE VENDOR USE FOR CONTINUOUS VULNERABILITY MANAGEMENT, WHAT PROCESS IS USED FOR REMEDIATION, AND HOW DO THEY REPORT VULNERABILITIES TO CUSTOMERS?

All integrations with Vermont systems will use secure, well-documented APIs. The vendor assures compliance with MARS-E standards and provides accountability through security-specific acceptance criteria. They will use Snyk for automated vulnerability scans and robust logging, alerting, and analytics. This is consistent with previous projects (i.e., Online Application Pilot.)

11.7 HOW DOES THE VENDOR DETERMINE THEIR COMPLIANCE MODEL AND HOW IS THEIR COMPLIANCE ASSESSED?

The State reports that:

[the] Compliance model is based on data types. In this case we are governed by CMS MARS-e requirements. We follow CMS's annual assessment requirement and conduct an annual security compliance assessment.

This meets all appropriate federal and State requirements.

12 RISK ASSESSMENT & RISK REGISTER

The risks identified throughout this review are collected below, along with an assessment of their significance, a description of the State response and timing, and our evaluation of the State response.

12.1 ADDITIONAL COMMENTS ON RISK

none

12.1.1 RISK REGISTER

The following table explains the Risk Register components:

Risk ID:	Identification number assigned to risk or issue.	
Risk Rating:	An assessment of risk significance, based on multiplication of (probability X impact ratings) (<i>see below</i>).	
	1-9 = low	See table below
	10-48 = moderate	
49-90 high		
Probability:	Assessment of likelihood of risk occurring, scale of 1,3,5,7, or 9 , from least to most likely	
Impact:	Assessment of severity of negative effect, scale of 1,3,5,7, or 10 , from least to most severe	
Finding:	Review finding which led to identifying a risk	
Risk Of:	Nature of the risk	
Source:	Project, Proposed Solution, Vendor or Other	
Risk domains:	What may be impacted, should the risk occur	
State's Planned Risk Strategy	Decision to <i>avoid, mitigate, or accept</i> risk	
State's Planned Risk response	Detailed description of response to risk, in order to accomplish decision	
Reviewer's Assessment:	Reviewer's evaluation of the State's planned response	

Risk Rating Matrix			IMPACT				
			Trivial	Minor	Moderate	Major	Extreme
			1	3	5	7	10
LIKELIHOOD	Rare	1	1	3	5	7	10
	Unlikely	3	3	9	15	21	30
	Moderate	5	5	15	25	35	50
	Likely	7	7	21	35	49	70
	Very Likely	9	9	27	45	63	90

Risk ID: R1	Rating:	21	
	Likelihood:	3	
	Impact:	7	
Finding:	<p>The SSAP deployment is dependent on successful completion of the Disaster Recovery project, which is running parallel to SSAP, though on a sooner target completion date. The SSAP project team has identified potential conflicts for resources while the DR project is underway and has adopted a risk response of "Watch" (which is not a standard PMBOK risk response) with a plan to monitor the situation and stay in close communication with the DR project. We agree this is generally the right approach at this time.</p>		
Risk Of:	resource conflict, delay		
Risk domains:	timeline		
State's Planned Risk Strategy:	Mitigate		
State's Planned Risk Response:	<p>The state agrees with this assessment. The status of "Watch" is a standard status option within the ADS EPMO project management tool, however, the PM/PCO agree that we should utilize a status of "mitigate" on this particular risk considering the approach. Change has been completed.</p>		
Reviewer's Assessment of State's Planned Response	Concur		

Risk ID: R2	Rating:	9	
	Likelihood:	3	
	Impact:	3	
Finding:	<p>The State project team, while excellently staffed, is functionally diverse and have many demands on their time. The vendor's proposed accelerated 4-month schedule has many benefits but could have delays if State staff are not available when needed. The project management team is extremely diligent and effective in moving this project along.</p>		
Risk Of:	project delay		
Risk domains:	timeline		
State's Planned Risk Strategy:	Mitigate		
State's Planned Risk Response:	<p>The state agrees with this assessment and will continue to mitigate this risk. The project team is adequately staffed but will face potential delays if enough state personnel are not available at key times in the scheduled work. The PM is planning to connect with the technical vendor as soon as possible to confirm the project schedule with key milestones, releases, and resource requirements to ensure we are appropriately staffed at critical project junctures. In addition, ADS/DVHA management is in the process of hiring two IT leads who will help fill the existing personnel gap and provide flexibility among IT management team members, which should help mitigate this risk. Finally, an initial project RACI has been developed and will be more fully fleshed out and distributed to the team once the technical vendor is onboard.</p>		
Reviewer's Assessment of State's Planned Response	Concur		

Risk ID: R3	Rating:	50	
	Likelihood:	5	
	Impact:	10	
Finding:	<p>The SSAP project team has related that Federal and State laws do not allow the State to require an SSN from an application filer who is not applying for Medicaid for themselves, and yet the underlying OnBase system uses SSNs for indexing. The project team is working diligently to find a solution to this problem. The current project risk log response is "Mitigate," but it looks more like a choice between "Avoid" and "Accept."</p>		
Risk Of:	potential non-compliance with legal requirements		
Risk domains:	compliance		
State's Planned Risk Strategy:	Avoid		
State's Planned Risk Response:	<p>The state agrees that the response is "Avoid". The state will not require an application filer who is not applying for Medicaid to provide an SSN; the application filer will have the ability to skip over the question.</p>		
Reviewer's Assessment of State's Planned Response	Concur		

Risk ID: R5	Rating:	25	
	Likelihood:	5	
	Impact:	5	
Finding:	The project's testing team reported that in some past projects, getting User Stories of adequate quality to convert into test criteria was sometimes problematic. The Agile development nature of this project will require User Stories of sufficient quality early, often, and on time.		
Risk Of:	project delay		
Risk domains:	timeline		
State's Planned Risk Strategy:	Mitigate		
State's Planned Risk Response:	The state agrees with this assessment. The QC Test Manager recommends including the QA testing team during User Story and Acceptance Criteria creation to ensure that User Stories are clear enough to draft test cases during each development sprint for execution in the following sprint without delay.		
Reviewer's Assessment of State's Planned Response	concur		

13 ATTACHMENTS

Attachment 1 – Cost Spreadsheet

Attachment 2 – Risk Register

Attachment 1: DVHA SSAP Cost Spreadsheet ver. 3.0a - Paul Garstki Consulting - 2021/July/21

Project Name:			Enterprise VoIP							Lifecycle Total @	
Description	Qty	Unit Price	Procurement	Maintenance	Maintenance	Maintenance	Maintenance	Maintenance	Total	Current Annual Cost	Benefit
Fiscal Year				FY1	FY2	FY3	FY4	FY5			
Hardware											
none			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Hardware Total			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Services											
Azure Hosting	12	\$ 40.00	\$ -	\$ 160.00	\$ 480.00	\$ 480.00	\$ 480.00	\$ 480.00	\$ 480.00	\$ 2,080.00	
Maximus Call Center (Cost Avoidance) ¹			\$ -							\$ -	\$ 28,415.00
Software Total			\$ -	\$ 160.00	\$ 480.00	\$ 480.00	\$ 480.00	\$ 480.00	\$ 480.00	\$ 2,080.00	\$ (2,080.00)
Consulting											
Independent Review			\$ 17,769.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 17,769.00	
Consulting Total			\$ 17,769.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 17,769.00	\$ (17,769.00)
Training											
none	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
	0	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Training Total			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Implementation Services											
DDI VENDOR											
Project Manager	165	\$ 150.38	\$ 24,812.70	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 24,812.70	
IT Lead/Scrum Master	495	\$ 150.38	\$ 74,438.10	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 74,438.10	
Developer	660	\$ 145.85	\$ 96,261.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 96,261.00	
Developer	660	\$ 166.50	\$ 109,890.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 109,890.00	
UIX/UX Specialist	660	\$ 136.22	\$ 89,905.20	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 89,905.20	
Release Engineer	660	\$ 158.61	\$ 104,682.60	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 104,682.60	
SECURITY VENDOR											
Code Scan, Security Assess., Pen. Test			\$ 16,625.00							\$ 16,625.00	
Implementation Services Total	3300		\$ 516,614.60	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 516,614.60	\$ (516,614.60)
Personnel - Additional											
State Personnel - DVHA/AHS											
Business Lead	521	\$ 65.00	\$ 33,865.00	\$ 205.00	\$ 836.40	\$ 853.13	\$ 870.19	\$ 887.59	\$ 37,517.31		
OCM Lead	50	\$ 65.00	\$ 3,250.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,250.00		
Testing Manager	138	\$ 65.00	\$ 8,970.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,970.00		
508 Compliance Lead	60	\$ 65.00	\$ 3,900.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,900.00		
BASU	100	\$ 65.00	\$ 6,500.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500.00		
BASU Manager	4	\$ 65.00	\$ 260.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 260.00		
BASU	4	\$ 65.00	\$ 260.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 260.00		
BASU	4	\$ 65.00	\$ 260.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 260.00		
Business SME	8	\$ 65.00	\$ 520.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 520.00		
Business SME	60	\$ 65.00	\$ 3,900.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,900.00		
Staff Attorney	4	\$ 65.00	\$ 260.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 260.00		
Project Oversight	70	\$ 65.00	\$ 4,550.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,550.00		
Policy Lead - Eligibility	60	\$ 65.00	\$ 3,900.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,900.00		
AOPS SME	150	\$ 65.00	\$ 9,750.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9,750.00		

AOPS SME	60	\$ 65.00	\$ 3,900.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,900.00		
AOPS SME	60	\$ 65.00	\$ 3,900.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,900.00		
AOPS SME	150	\$ 65.00	\$ 9,750.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9,750.00		
Business SME - ADPC	200	\$ 65.00	\$ 13,000.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,000.00		
State Personnel - ADS Contracted Labor													
Project Manager	833	\$ 110.00	\$ 91,630.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 91,630.00		
Business Analyst	1042	\$ 135.00	\$ 140,670.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 140,670.00		
Project Coordinator	208	\$ 100.00	\$ 20,800.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 20,800.00		
Testing Lead	377	\$ 80.00	\$ 30,160.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 30,160.00		
Tester	324	\$ 80.00	\$ 25,920.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 25,920.00		
Tester	324	\$ 90.00	\$ 29,160.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 29,160.00		
State Personnel - ADS													
Sr. Business Analyst	104	\$ 88.00	\$ 9,152.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9,152.00		
Enterprise Architect	729	\$ 88.00	\$ 64,152.00	\$ 11,440.00	\$ 45,760.00	\$ 45,760.00	\$ 45,760.00	\$ 45,760.00	\$ 45,760.00	\$ 45,760.00	\$ 258,632.00		
Enterprise Architect	42	\$ 88.00	\$ 3,696.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,696.00		
Security Director	167	\$ 88.00	\$ 14,696.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14,696.00		
IT Manager	208	\$ 84.00	\$ 17,472.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 17,472.00		
ADS Contracting/Procurement	80	\$ 84.00	\$ 6,720.00	\$ 2,184.00	\$ 8,736.00	\$ 8,736.00	\$ 8,736.00	\$ 8,736.00	\$ 8,736.00	\$ 8,736.00	\$ 43,848.00		
IT Manager, Enterprise Architect	25	\$ 84.00	\$ 2,100.00								\$ 2,100.00		
											\$ -		
			\$ 567,023.00	\$ 13,829.00	\$ 55,332.40	\$ 55,349.13	\$ 55,366.19	\$ 55,383.59	\$ 802,283.31				\$ (802,283.31)
Grand Total			\$ 1,101,406.60	\$ 13,989.00	\$ 55,812.40	\$ 55,829.13	\$ 55,846.19	\$ 55,863.59	\$ 1,338,746.91	\$ 28,415.00			\$ (1,338,746.91)

ATTACHMENT 2 - DVHA SSAP INDEPENDENT REVIEW -- Risk and Issues Register -- version 2.0.a 2021/July/15 -- Paul E. Garstki, JD -- Paul Garstki Consulting

RISKS	What is the finding that leads to identifying a risk? (This is a highly condensed version that is explained more fully in the report narrative)	What are the risks implied by the finding?	What aspects of the project are at risk if the risk(s) are realized?	What is the State's response to the risk?	What is the Independent Reviewer recommending? (The Reviewer does not necessarily make a recommendation for each risk)	Is the State's response to this risk adequate?	Reviewer's assessment of likelihood risk is realized 1,3,5,7, or 10	Reviewer's assessment of impact if risk is realized 1,3,5,7, or10	1-9 low
									10-48 medium
Note: Risk ID # list may have gaps, in order to maintain consistency with earlier drafts									
Risk #	Finding	risk of	risk domains	SOV response	Reviewer Recommendation	Reviewer Assessment of SOV Response	likelihood 1-10	impact 1-10	total rating
R1	The SSAP deployment is dependent on successful completion of the Disaster Recovery project, which is running parallel to SSAP, though on a sooner target completion date. The SSAP project team has identified potential conflicts for resources while the DR project is underway, and has adopted a risk response of "Watch" (which is not a standard PMBOK risk response) with a plan to monitor the situation and stay in close communication with the DR project. We agree this is generally the right approach at this time.	resource conflict, delay	timeline	The state agrees with this assessment. The status of "Watch" is a standard status option within the ADS EPMO project management tool, however, the PM/PCO agree that we should utilize a status of "mitigate" on this particular risk considering the approach. Change has been completed.	Mitigate: -- The DR Team and the SSAP are closely monitoring the project schedules and staying in communication. -- Identify potential escalation strategies if schedule conflict becomes problematic (with SSAP vendor? CMS?)	Concur	3	7	21
R2	The State project team, while excellently staffed, is functionally diverse and have many demands on their time. The vendor's proposed accelerated 4-month schedule has many benefits, but could have delays if State staff are not available when needed. The project management team is extremely diligent and effective in moving this project along.	project delay	timeline	The state agrees with this assessment and will continue to mitigate this risk. The project team is adequately staffed but will face potential delays if enough state personnel are not available at key times in the scheduled work. The PM is planning to connect with the technical vendor as soon as possible to confirm the project schedule with key milestones, releases, and resource requirements to ensure we are appropriately staffed at critical project junctures. In addition, ADS/DVHA management is in the process of hiring two IT leads who will help fill the existing personnel gap and provide flexibility among IT management team members, which should help mitigate this risk. Finally, an initial project RACI has been developed and will be more fully fleshed out and distributed to the team once the technical vendor is onboard.	Mitigate: Promulgate RACI to key members throughout the team. Engage early with vendor to identify key needs and timeframes for State participation.	Concur	3	3	9
R3	The SSAP project team has related that Federal and State laws do not allow the State to require an SSN from an application filer who is not applying for Medicaid for themselves, and yet the underlying OnBase system uses SSNs for indexing. The project team is working diligently to find a solution to this problem. The current project risk log response is "Mitigate," but it looks more like a choice between "Avoid" and "Accept."	potential non-compliance with legal requirements	compliance	The state agrees that the response is "Avoid". The state will not require an application filer who is not applying for Medicaid to provide an SSN; the application filer will have the ability to skip over the question.	Avoid: -- prioritize this problem and resolve it OR -- do not require SSNs in this context (possibly unrealistic) AND --consult AGO for strategies	Concur	5	10	50
R4	[deleted]								0
R5	The project's testing team reported that in some past projects, getting User Stories of adequate quality to convert into test criteria was sometimes problematic. The Agile development nature of this project will require User Stories of sufficient quality early, often, and on time.	project delay	timeline	The state agrees with this assessment. The QC Test Manager recommends including the QA testing team during User Story and Acceptance Criteria creation to ensure that User Stories are clear enough to draft test cases during each development sprint for execution in the following sprint without delay.	Mitigate: Up-front identification of User Story sources; provide them with useful instruction;	Concur	5	5	25
R6							0	0	0
R8							0	0	0
R9							0	0	0
R10							0	0	0