BerryDunn

Independent Review

Long-Term Care Case Management Project Independent Review
For the
State of Vermont
Agency of Digital Services

Submitted to the
State of Vermont, Agency of Digital Services
August 14, 2023

FINAL

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1.0 Executive Summary

For all Information Technology (IT) activities over $1 million, 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 Berry Dunn McNeil & Parker, LLC (BerryDunn) to conduct an Independent Review of the Long-Term Care (LTC) Case Management Project. This Independent Review began on May 31, 2023, and the presentation of findings took place on August 10, 2023.

The Department of Vermont Health Access (DVHA) has chosen the Salesforce platform to implement a case management solution for the LTC Medicaid program. The State issued four requests for proposals (RFPs) for technical services to implement a Salesforce solution with a period of support services, including transition of support services to State personnel over a period of up to two years.

The State issued the first two to vendors with IT retainer contracts, which resulted in only one response received. To solicit more responses from the vendor community, the State issued the RFP a third time in April 2022 as an open, competitive bid; however, the State was not able to appropriately score the proposals due to a discrepancy between the RFP and the Bidder Response Form regarding the number of years of support requested. Specifically, the RFP requested two years, but the Bidder Response Form required vendors to propose five years.

In September 2022, the State reissued the RFP, and eight vendors submitted responses. Upon completion of proposal scoring, reference checks, and discussions during vendor interviews, the proposal evaluation team recommended the State pursue a contract with Tech Mahindra to implement the LTC case management solution, which was approved by the DVHA Commissioner and the ADS Secretary in February 2023.

While conducting this Independent Review, BerryDunn identified five risks, with three 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.

It is important to note that this report is based on a single point in time and does not include information on all progress made on the project after June 19, 2023. However, there are updates to each risk based on discussions with the State during the presentation of findings on August 10, 2023.

1.0 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 0.1: Cost Summary

IT Activity Life Cycle	Cost and Funding Source
Total Life Cycle Costs (Five Years)	$2,547,284.23
Total Implementation Costs	$1,890,827.07
New Annual Operating Costs (Four Years)	$656,457.16
Current Annual Operating Costs (Four Years)	$0
Difference Between Current and New Operating Costs	$656,457.16
Funding Source(s) and Percentage Breakdown of Multiple Sources	90% Federal (Implementation) 10% State (Implementation) 75% Federal (Operations) 25% Federal (Operations)

1.1 Disposition of Independent Review Deliverables

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

Table 0.2: Independent Review Deliverables

Deliverable	Highlights From the Independent Review Include Explanations of Any Significant Concerns
Acquisition Cost Assessment	The proposed solution includes a one-time acquisition cost of $1,890,827.07. The vast majority acquisition costs on this project are for contractor resources for implementation, ADS services (e.g., Enterprise Project Management Office [EPMO], Enterprise Architect [EA], and security), and BerryDunn's Independent Review services totaling $1,380,327.07. The remaining costs are for Salesforce licenses and vendor implementation services totaling $486,000. Based on BerryDunn's experience with providing system procurement and system implementation services on similar projects, the State is paying comparable cost for Tech Mahindra's technical services.
Technology Architecture and Standards Review	The State is procuring technical services to implement a Salesforce solution to fulfill DVHA's case management needs.

Deliverable	Highlights From the Independent Review Include Explanations of Any Significant Concerns
	Salesforce is in alignment with the State's IT strategic principles, is sustainable, scalable, and extensible to meet the LTC Medicaid program's longer-term needs. As part of contract negotiations, the State proposed service level credits to help ensure that Tech Mahindra complies with the State's service level agreements (SLAs). Due to the lack of an Information Technology Information Library (ITIL) compliant tool, tracking and monitoring SLA measurements is manual, and Tech Mahindra did not factor in the administrative overhead into the proposed support and maintenance costs. Tech Mahindra proposed an alternate approach, which puts the responsibility on the State to track and monitor SLA measurements. More information on this risk can be found in Attachment 2 – Risk Register in this report.
Implementation Plan Assessment	The project has a 22-week implementation timeline, which includes one week for system integration testing (SIT), two weeks for user acceptance testing (UAT), and two weeks for user training. Any delays in completing the project activities could result in slippage in the overall project timeline or alternatively, the push to complete the key activities within the current project timeline could result in inadequate quality of the system or Tech Mahindra's project deliverables. There are other risks that could impact the implementation timeline as described in Attachment 2 – Risk Register in this report.
Cost-Benefit Analysis	While the tangible benefits appear negligible, BerryDunn's opinion is that the intangible benefits for the State outweigh the one-time costs for implementation and ongoing operating costs.
Analysis of Alternatives	A team of technical and business representatives from the State evaluated and scored various aspects of eight vendors' proposals received. Based on the scores, the State's proposal evaluation team deemed Hike2 and Tech Mahindra as viable options and conducted follow-up interviews with these two bidders. Upon completion of proposal scoring, reference checks, and review and discussion on the vendor questions, the proposal evaluation team recommended the State pursue a contract with Tech Mahindra to implement the LTC case management solution. BerryDunn believes the competitive bid process was a sound approach to understanding the State's options for procuring technical services to implement the Salesforce LTC case management solution.

Deliverable	Highlights From the Independent Review Include Explanations of Any Significant Concerns
Impact Analysis on Net Operating Costs	There is a net annual increase in operational costs with no break-even point since the solution is not replacing an existing system.
Security Assessment	Based on BerryDunn's assessment of Tech Mahindra's proposal and information collected during interviews with the State, BerryDunn recommends that the State ensure configuration of the solution and access to the stage and production environments prevents unauthorized users and Tech Mahindra's technical team accessing personal identifying information (PII) and personal health information (PHI).

1.2 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 0.3: Project Risk Summaries and Ratings

Risk #	Risk Description	Risk Likelihood/ Probability	Risk Impact	Overall Risk Rating
1	The State and Tech Mahindra have not agreed on financial penalties for SLAs, which could result in an increase in the projected ongoing costs or delay contract execution and the overall project timeline.	High	High	High
2	Tech Mahindra might assign key staff that do not have comparable skillsets and experience to staff originally proposed, which could impact the quality of work products and deliverables.	Medium	High	High
5	Unauthorized users or vendor resources could access personal identifying information (PII) and/or personal health information (PHI).	Low	High	Medium

1.3 Other Key Issues

There are no other key issues to report.
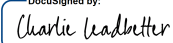
1.4 Recommendation

BerryDunn recommends that the State continue contract negotiations with Tech Mahindra and monitor and mitigate the risks outlined in Attachment 2 – Risk Register in this report.

1.5 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.

Charlie Leadbetter E0E8D90BAA8541F...	8/23/2023
Independent Reviewer Signature	**Date**

1.6 Report Acceptance

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

Denise Reilly-Hughes 6041A76735A7442	8/25/2023
State of Vermont Chief Information Officer	**Date**

2.0 Scope of This Independent Review

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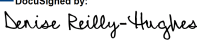
The scope of this document is fulfilling the requirements of Vermont Statute, Title 3, Chapter 56, §3303(d).

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 May 29, 2023: Conduct project initiation; review documentation; schedule interviews; develop participation memos
- Weeks of June 5, 2023, and June 12, 2023: Conduct interviews with the State and vendor; collect additional information from the State
- Week of June 19, 2023: Conduct additional research; document initial findings; provide the preliminary Independent Review Report to the State
- Week of June 26, 2023: Collect feedback; update the Independent Review Report; submit the proposed final draft Independent Review Report to the State
- Week of August 7, 2023: Present the Independent Review Report to the CIO
- Week of August 14, 2023: Complete any follow-up work and updates to the Independent Review Report; obtain CIO sign-off via the State project manager on the Independent Review Report

2.1 Out of Scope

BerryDunn did not evaluate the following areas during this Independent Review:

- OnBase – the system that will receive data from the Salesforce solution to generate forms

- ACCESS – the system of record for the LTC case data that will be sent to the Salesforce solution

3.0 Sources of Information

3.0 Independent Review Participants

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

Table 0.1: Independent Review Participants

Name	Organization and Role	Participation Topic(s)
Daniel McGibney	ADS – Project Manager	Project Kickoff, Project Leadership, Information Technology, Project Management, Vendor Interview
Bill Keryc	ADS – Business Analyst	Project Management
Joseph Liscinsky	DVHA – Project Sponsor	Project Leadership
Michelle Betit	DVHA – Business Lead	Project Leadership, Security
Lisa Racine	DVHA – LTC Subject Matter Expert (SME)	Project Leadership, Project Financial
Emily Wivell	ADS – Security Analyst	Information Technology
David Johnston	DVHA – IT Lead	Information Technology
Grant Steffens-Hodgkins	DVHA – IT Manager	Information Technology
Sean Judge	ADS – Enterprise Architect	Information Technology
Sujeet Nuthulapaty	Tech Mahindra – Project Manager	Vendor Interview
Arpit Shastri	Tech Mahindra – Account Manager	Vendor Interview

3.1 Independent Review Documentation

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

Table 0.2: Independent Review Documentation

Document Name	Description	Source
IT Activity Business Case (ABC) Form	The form required for all IT activities with an estimated cost over $100,000	ADS

Document Name	Description	Source
Project Charter	The document with written authority to begin work on the project	ADS
Request for Proposal (RFP) – 9/9/2022	The RFP for IT services for the project	ADS
Exhibit C – State of Vermont Bidder Response Form Submitted by Tech Mahindra	The technical response submitted by Tech Mahindra and scored by the State	ADS
Standard Contract for Technology Services – Draft	The draft contract between the State and Tech Mahindra	ADS
SLA Adherence Incentive Model	A document outlining Tech Mahindra's proposed alternate financial model for SLAs	ADS
LTC Vendor Proposal Ratings	The State's score for the proposals submitted by IT vendors	ADS
Vendor Interview Questions	A document outlining an agenda with approximately 10 questions for vendor interviews	ADS
Recommendation for Award	A memorandum requesting approval from the DVHA Commissioner and ADS Secretary to move forward with issuing a Notice of Award to Tech Mahindra and begin contract negotiations	ADS

4.0 Project Information

4.0 Historical Background

LTC Medicaid case management processes are manual, and staff use multiple Excel spreadsheets to:

- Track member and application data that must be combined to perform data quality checks so Key Performance Indicator (KPI) reports can be generated for reporting to DVHA leadership

- Assign each application to the Long-Term Care Specialist (LTCS) staff in a round robin distribution for workload assignments

- Track workload levels for LTCS staff

- Pull reports including total application count and application distribution

- Upload data to OnBase to be part of the case record

Data collected during the complex and unstandardized interview process is entered as notes in ACCESS. LTCS staff find this process to be time consuming and prone to errors, as staff can forget to enter all interview data into ACCESS, which is an important part of the LTC case.

Additionally, the LTC Medicaid program does not have the ability to generate a pre-populated application for LTC Medicaid members. Instead, members must complete a full application for their renewal each year.

DVHA has chosen the Salesforce platform to store and maintain LTC case and case tracking data for the LTC Medicaid program. The State has selected Tech Mahindra as its preferred vendor to provide technical services for design, development, and implementation (DDI), project management, training, and post-implementation support and maintenance for the new Salesforce solution.

4.1 Project Goals

The goal of this project is to use Salesforce as the repository for LTC case and case tracking data. DVHA has the following goals for the LTC Case Management Project:

- Improve LTC Medicaid member satisfaction by decreasing application processing time

- Reduce manual processes and errors

- Increase staff productivity

- Increase reporting capabilities

4.2 Project Scope

The State seeks to replace Excel spreadsheets and manual processes with a Salesforce solution comprised of the following scope:

- Creating a single repository for LTC Medicaid case and case tracking data

- Loading data from ACCESS to auto-populate case records and combining it with case data entered by LTCS staff

- Pre-populating and auto-generating LTC Medicaid forms, including the LTC annual Medicaid review form

- Storing Salesforce-generated LTC Medicaid forms in OnBase

- Configuring a scripted LTC Medicaid application interview workflow process

- Providing multiple reporting options to extract KPIs and workload management

- Providing pre- and post-implementation education and functionality training via the Salesforce solution for the LTC environments as requested and appropriate

- Using standard objects and features of Salesforce to not impede future configuration, customization, or component and feature reuse

4.3 Major Deliverables

Table 4.1 provides a summary of the deliverables, descriptions, and frequency, as articulated in the draft contract with Tech Mahindra. Deliverables with an asterisk may require collaboration with the State's project manager and/or State staff assigned to the project.

Table 4.1: Project Deliverables and Frequency Proposed by the Vendor

Deliverable	Description	Frequency
Kickoff Meeting Agenda & Meeting Presentation*	The kickoff meeting agenda will include the list of attendees, meeting date, duration, and location as well as the topics to be covered. The kickoff meeting presentation will include organizational charts of key project staff and a description of roles and responsibilities for each project phase. There will be graphical representation of the proposed project schedule, timeline, and scope. Descriptions of project approach and methodology will be presented as well as an overview of what the State should expect during the various phases and stages of the project.	10 business days prior to project kickoff

Deliverable	Description	Frequency
Project Management Plan	The Project Management Plan will dictate specifics on how the Contractor Project Manager will administer the project.	As needed
Formal Acceptance Criteria*	Criteria to establish the acceptance and rejection for each document on this list.	As needed
Certificate of Acceptance	Sign-off at the completion of each project deliverable as defined by the formal acceptance criteria.	Once per deliverable due in accordance with the Project Schedule
Change Requests	Formal documents that outline any changes to the contract scope, schedule, budget, and resources.	As needed
Change Requests Log*	A log that will track the specific change requests approved and their impact to the project scope, budget, and schedule.	Update per frequency as defined in the Change Management Plan
Budget Log	A log that outlines original contract costs by deliverable with billed and paid-to-date information.	Monthly
Action Items Log	A log of project actions to include: an identification (ID) number, the requestor, responsible party, date assigned, target date of completion, status/updates, and actual completion date.	As needed
Risks & Issues Log*	A log of all risks and issues (opened or closed/resolved) that could impact the project. Risks should be outlined by their impact and their potential to occur. All risks should have an owner. Issues should be outlined by their impact, owner, date of occurrence, and remediation strategy.	Updated per frequency as defined in the Risk and Issue Management Plan
Decision Log*	A log of all decisions made over the course of the project. Decisions should have a date and name of decider.	As needed
Requirements Documents	A finalized list of the project requirements to be approved by the State. The approach is dictated by the Requirements Management Plan (see Project Management Plan) and can include: Stated Requirements Document (SRD): The SRD contains current-state process flows, user stories, and business rules and states the business need at a high level.	Once initially; updated if changes are made

Deliverable	Description	Frequency
	Business Requirements Document (BRD): The BRD contains a medium level of requirements as well as required metrics of project success. Functional Requirements Document (FRD): The FRD contains detailed requirements that can be handed off to the Contractor for execution. Technical Design Document (TDD): The TDD will include design, architecture, configuration, component integration, and data mapping and ingestion technical details.	
Test Plans*	A plan describing the testing approach, participants, tools and environments, sequence of testing, and testing preparations.	Once
Test Cases & Results*	The specific test cases to be tested and the testing results. Test cases tie back to the project requirements (to help ensure each one has been met).	Create once then update with results
Project Schedule*	The Project Schedule outlines how the project will go live and will include a mini project plan for the exact events that need to occur, assigned to the resources that need to do them, as well as the time frame for when they need to be completed.	As needed
Project Status Reports	Report that will provide an update on the project health, accomplishments, upcoming tasks, risks, and significant issues. The Project Status Report shall be developed in consultation with the State business lead and State project manager.	Weekly
Project Phase Audit/Gate Check	At the end of each phase, the vendor Project Manager shall submit an audit of all deliverables and milestones achieved during the phase to the State project manager for review. In most cases, the Deliverable Acceptance Document form will suffice.	Once per milestone
Meeting Agendas/Minutes	All scheduled meetings will have an agenda and minutes. The minutes shall contain risk issues, action items, and decision logs.	Per occurrence

Deliverable	Description	Frequency
	Minutes shall be transcribed over to the main logs.	
End of Project Metrics	Metrics that reflect how well the project was performed. Metrics will be outlined in the Quality Management Plan.	Once
Lessons Learned*	A compilation of the lessons learned having 20/20 hindsight. Lessons learned shall be delivered in an Excel template and collected from each of the State and vendor project team members to get a full 360-degree view of the project in retrospect.	Once
Closeout Report*	This report will include final acceptance, all the lessons learned, project metrics, and a summary of the project's implementation and outcome in operation.	Once

4.4 Project Phases and Schedule

Table 4.2 is a summary of the project phases, estimated start dates, and a description for each phase, as articulated in the draft contract with Tech Mahindra.

Table 4.2: Project Phases, Estimated Dates, and Phase Description

Project Phase	Estimated Start Date	Description
Initiation	9/28/2023	Kickoff meeting, planning, and preparation of project management planning documentation.
Requirements Gathering	10/2/2023	Contractor performs necessary requirements gathering to finalize functional and technical requirements and identify gaps between State requirements and solution capabilities.
Implementation	10/26/2023	Contractor installs and configures the solution in a test environment.
Testing	1/23/2024	State SMEs perform solution testing in a test (not live) environment in accordance with Contractor and State-developed test plans.
Training	2/20/2024	Contractor performs training of State personnel (train the trainer or train the user).
Legacy Data Migration	3/29/2024	Contractor shall perform all necessary legacy data migrations using State-approved migration plan and data mapping templates.

Project Phase	Estimated Start Date	Description
Deployment	3/29/2024	Contractor implements the tested and State-approved solution in the production environment for additional State testing and go-live.
Post-Implementation Support/Warranty	3/29/2024	Contractor shall be responsible for fixing all defects found during the warranty period. All defects found within the warranty period shall be corrected by the Contractor at no additional cost to the State.

5.0 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
Implementation Services	$404,000	Tech Mahindra's implementation services
Other Contracted Professional Services for Implementation	$254,867.97	Staff augmentation for EA services
ADS Enterprise Project Management Oversight (EPMO) Project Oversight	$24,303.20	Provided on the IT ABC Form
ADS EPMO Project Manager	$413,154.40	Provided on the IT ABC Form
ADS EPMO Business Analyst (BA)	$182,621.19	Provided on the IT ABC Form
ADS Enterprise Architect (EA)	$191,648.09	Provided on the IT ABC Form
ADS Security Staff	$48,606.40	Provided on the IT ABC Form
ADS IT Labor	$265,125.82	Provided on the IT ABC Form
Independent Review	$24,500	Provided on the executed Independent Review Statement of Work
Total One-Time Acquisition Costs	**$1,890,827.07**	

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

    BerryDunn validated acquisition costs during documentation review and an interview with the State's 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?

    Due the State's decision to leverage the Salesforce platform and to procure implementation services for this project, it is difficult to find a comparable technical solution that BerryDunn could adequately compare to this project's acquisition costs. Rather, BerryDunn used the proposed costs from the other vendors that submitted proposals to the project's RFP. Table 5.2 below outlines the seven vendors' proposed implementation cost.

Vendor	Proposed Implementation Cost
Brite Systems	$1,126,555

Vendor	Proposed Implementation Cost
Cloud SynApps	$614,757
Eclat	$605,025.36
Hike2	$314,200
NewWave	$1,020,153
Optum	$524,132
Speridian	$975,000

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

As outlined above, the State appears to be paying a lower cost to what other vendor proposed. Additionally, based on BerryDunn's experience with providing system procurement and system implementation services on similar projects, the State is paying comparable cost for Tech Mahindra's technical services.

6.0 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

   The Salesforce LTC case management solution is anticipated to streamline and standardize business processes and will help reduce data entry errors while helping ensure LTC Medicaid program goals are met serving Vermont Medicaid members.

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

   The following benefits are anticipated with the Salesforce solution:

   - **Customer Service** – Pre-populated annual renewal forms will reduce the burden on LTC Medicaid members at the time of their annual renewal as they will not need to complete the LTC application, which can be up 16 pages long.

   - **Compliance** – A standardized interview process will reduce error rates and help ensure a more complete case record for LTC Medicaid members.

   - **Productivity** – The omission of the need to maintain multiple Excel files and reduction in manual processes will increase productivity and improve staff morale.

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

   The Salesforce LTC case management solution will eliminate the data being managed and stored in multiple, disparate spreadsheets by creating a central repository for case and case tracking data.

   d. Assess if the technology solution will optimize process

   The Salesforce LTC case management solution is anticipated to streamline the case management and reporting processes by optimizing on Salesforce capabilities such as automated workflows and data dashboard reporting.

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

   The Salesforce platform provides a data security model that secures data at multiple levels from the organization to individual records and fields. This tiered level of security allows the State to restrict data access widely across the organization and then open access for selected roles and users on the levels below. The Salesforce platform provides security controls at four levels (organization-level security, object-level security, field-level security, and record-level security).

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

Tech Mahindra follows the Salesforce Methodology, which fits into the best practices of the Salesforce enterprise architecture. The Salesforce Methodology offers a high degree of fit, configurability, scalability for functionality, flexibility, and long-term viability; it also provides the features and benefits of iterative configuration and long-term sustainability.

3. **How does the solution comply with the ADS Strategic Goals enumerated in the ADS Strategic Plan of January 2021?**

Based on BerryDunn's assessment, the proposed solution aligns with the following ADS strategic goals:

- Goal 1: IT Modernization – Retire and replace disparate applications (e.g., Excel) with an integrated Salesforce platform

- Goal 2: Vermonter Experience – Improve Vermonter's experience by improving application processing time and reducing the need for LTC Medicaid members to complete a full application for annual renewals

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.

Salesforce can be configured to be Section 508 compliant, and the State plans to include this requirement in the contract with Tech Mahindra.

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 improving the plan?

Salesforce offers multiple layers of redundancy so that many failures can be recovered promptly. Salesforce's recovery point objective number is for when a data center is unavailable. Because data is replicated between data centers, backups are only used should the primary recovery mechanism fail. Salesforce disaster recovery services are delivered using multiple data centers supporting primary and replicated disaster recovery instances.

It is BerryDunn's belief that the Salesforce platform's disaster recovery plan meets industry best practices and technical standards.

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

Tech Mahinda will enable the built-in data retention Salesforce features based on the State's requirements.

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

   BerryDunn believes the SLAs outlined in the draft contract are sufficient to meeting the State's needs. However, as part of contract negotiations, the State proposed service-level credits to help ensure that Tech Mahindra complies with the State's SLAs. Due to the lack of an ITIL compliant tool, tracking and monitoring SLA measurements is manual, and Tech Mahindra did not factor in the administrative overhead into the proposed support and maintenance costs. Tech Mahindra proposed an alternate approach, which puts the responsibility on the State to track and monitor SLA measurements. More information on this risk can be found in Attachment 2 – Risk Register in this report.

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?

   Salesforce allows users to generate reports in a variety of formats, with the ability to apply different visualization types to each report. Dashboards can be built and shared with other users based on standard and/or customized reports. The data from these reports and dashboards can be exported in a variety of formats, including PDF, Word, Excel, and CSV file.

   The planned interfaces include a daily one-way interface with ACCESS to receive a flat file containing LTC data and a one-way interface with OnBase via an application programming interface (API) for document storage.

7.0 Assessment of Implementation Plan

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

   The project has a 22-week implementation timeline, which includes one week for SIT, two weeks for UAT, and two weeks for user training. Based on BerryDunn's assessment and interviews with State and Tech Mahindra regarding the planned duration and available resources to complete each phase of the project, BerryDunn believes there are risks, should they not be mitigated, could cause delays in the implementation timeline. See Attachment 2 – Risk Register for more information on these risks and the State's mitigation strategies.

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

   DVHA leadership reported that the LTC staff are excited for the implementation of a case management solution. The department has engaged an organizational change management (OCM) resource to help with change management activities such as communications for building awareness of the planned changes. BerryDunn encourages DVHA to regularly evaluate readiness for change to help ensure successful adoption of the new solution.

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**

   In the draft contract, Tech Mahindra is responsible for developing and maintaining a project management plan, which should include a communication management plan, change management plan, and quality management plan. Other project management-related deliverables include project management logs (risk and issue, change requests, action items) and a project management plan. In the technical proposal, Tech Mahindra also describes enough of the methods and strategies that will be used for these items to provide enough detail to hold them accountable for meeting the business needs related to project management.

   b. **Training**

   In its proposal, Tech Mahindra describes its plan to use a train-the-trainer model to help ensure all roles and users are provided sufficient preparation to use the solution. This approach requires the State to identify "Super Users" to support this learning method.

   BerryDunn believes Tech Mahindra's proposed approach to training is sufficient, but the draft contract does not include the training-related deliverables that were outlined in Tech Mahindra's technical proposal. We recommend that the State consider including deliverables to hold Tech Mahindra accountable for meeting both DVHA and ADS' training needs.

c. Testing

In its proposal, Tech Mahindra provided a full life system of testing. Tech Mahindra proposes the use of Unit and SIT, including regression testing, as part of the V-Testing Model, as depicted below.

The 'V' Testing Model
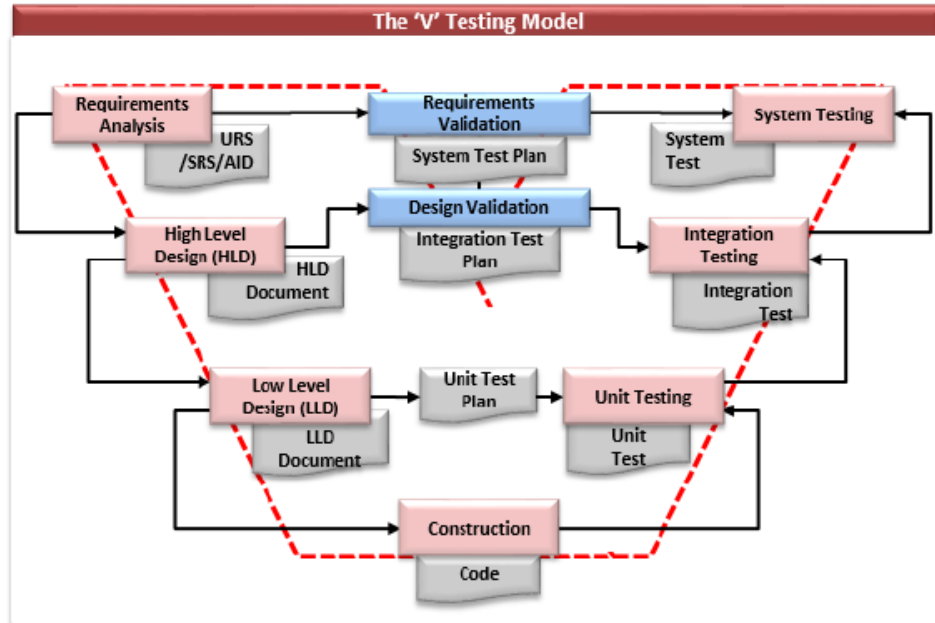
PMO Toolkit to ensure test coverage

The draft contract also includes testing deliverables, such as test plans, test cases, and test results, which is enough detail to hold Tech Mahindra accountable for meeting the business needs around testing.

d. Design

Following an Agile methodology, design sprints will include conducting workshops to gather business and design requirements to develop user stories, process flows, and KPIs. Tech Mahindra is expected to develop requirements documents (e.g., Functional Requirements Document and TDD) as articulated in the draft contract.

e. Conversion (If Applicable)

In its proposal, Tech Mahindra describes its guiding principles for data conversion, including due diligence studies, data migration management and monitoring, data cleanliness, data migration approach, logical data models, data extraction and loading, and performance acceptance testing of loaded data. Tech Mahindra also details how it will scope and implement its data migration approach (including best practices it will follow). BerryDunn recommends that the State communicate expectations on the TDD deliverable to help ensure it includes details regarding data

conversion and migration to hold Tech Mahindra accountable for meeting the business needs is this area.

f. **Implementation Planning**

In the draft contract, the State requires Tech Mahindra to support release management activities using the Azure DevOps tool, in alignment with the State's release management processes for implementation. Release management tasks include creating and executing automated test cases, implementing a formal deployment process, assisting with User Acceptance Testing (UAT) and User Verification Testing (UVT) activities, and resolving issues.

g. **Implementation**

In the technical proposal, Tech Mahindra explained that its deployment team will make sure all the required production deployment packages are in place so that the overall implementation completes seamlessly. Tech Mahindra will make sure the development and testing teams are available for any immediate assistance. There will be a back-out plan from a contingency point of view, and Tech Mahindra's developers will carry out post-production deployment validation and the results will be shared with the State.

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.**

The State has a project manager allocated to the project and based on our interactions with the State project manager during this Independent Review, and feedback from the DVHA project leadership team received during an interview, BerryDunn has confidence that the individual has the skills, experience, and supporting resources necessary for the role.

8.0 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, the draft contract, and financial information provided by the State project manager. These costs were verified in an interview with the State project manager.

   BerryDunn discussed the benefits of the project during interviews with the State and are incorporated in this report.

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

   The cost-benefit analysis was performed using the following assumptions:

   - All payments to Tech Mahindra I will be made in State fiscal year (FY) 2024.

   - Costs for Salesforce licenses are for all the required DVHA and ADS staff and incur in FY 2024.

   - There is a five-year life cycle, with implementation activities beginning in September 2023 and ending in May 2024.

   - There is not an increase in costs for Tech Mahindra to provide post-implementation support and maintenance.

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.

   DVHA will use 90% federal funds and 10% State funds for implementation costs, and 75% federal funds and 25% State funds for ongoing operational costs.

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.

   Tangible Costs

   - **Implementation Services –** A one-time cost of $404,000

   - **Other Contracted Professional Services for Implementation –** Contracted staff to support the implementation total $254,867.97

   - **ADS EPMO Project Management, Security Analyst, Other ADS Labor and Other State Labor –** These one-time costs total $1,125,459.10

- **Salesforce Licenses –** $82,000

Tangible Benefits

Based on interviews with the State, there does not appear to be tangible benefits resulting from this project. If there are any cost savings, they are likely negligible.

5. **Intangible Costs and Benefits:** Provide a list and descriptions of the intangible costs and benefits. It is "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).

   Based on documentation review and interviews with the State, BerryDunn identified the following intangible benefits:

   - **Customer Service** – Pre-populated annual renewal forms will reduce the burden on LTC Medicaid members at the time of their annual renewal as they will not need to complete the LTC application, which can be up 16 pages long.

   - **Compliance** – A standardized interview process will reduce error rates and help ensure a more complete case record for LTC Medicaid members.

   - **Productivity** – The omission of the need to maintain multiple Excel files and reduction in manual processes will increase productivity and improve staff morale.

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.

   While the tangible benefits appear negligible, BerryDunn's opinion is that the intangible benefits for the State outweigh the one-time costs for implementation and ongoing operating costs.

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

   At the time of this Independent Review, the State project manager was in the process of updating the IT ABC form with the most recent cost information based on the costs in the draft contract. The information in the draft IT ABC form is consistent with the financial components within this Independent Review Report.

9.0 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.**

A team of technical and business representatives from the State evaluated and scored various aspects of the vendors' proposals, with the total score comprising of the following:

- **Quality of Proposal Content:** Vendor proposal/solution and ability to meet the State's functional and non-functional requirements (40%)

- **Cost:** Pricing, including licensing, maintenance, and warranty (20%)

- **Prior Experience with This Type of Work:** Vendor profile, experience, financial strength, references (20%)

- **Timeline for Completion of Work to be Performed:** Professional implementation services, project management and technical services (20%)

Eight proposals were received, and Table 9.1 below shows the evaluated vendors' weighted scores with totals.

Table 9.1: Summary of Proposal Scores

Rating Criteria	Brite Systems	Cloud Synapps	Eclat ISS	Hike2	New Wave	Optum	Speridian	Tech Mahindra
Quality of Proposal Content	133.33	133.33	120.00	140.00	140.00	146.67	146.67	146.67
Cost	43.33	83.33	53.33	90.00	43.33	46.67	50.00	90.00
Prior Experience	80.00	66.67	66.67	73.33	73.33	73.33	73.33	70.00
Timeline	43.33	73.33	73.33	66.67	60.00	70.00	73.33	66.67
Total Score	**300.00**	**356.67**	**313.33**	**370.00**	**316.67**	**336.67**	**343.33**	**373.33**

After initial scoring, the State conducted interviews with Hike2 and Tech Mahindra. Upon completion of proposal scoring, reference checks, and review and discussion of the vendor questions, the proposal evaluation team recommended the State pursue a contract with Tech Mahindra to implement the LTC case management solution with two conditions:

1. The two parties come to mutual agreement on terms and conditions to the exceptions noted by Tech Mahindra before proceeding with further effort on development of the Scope of Work

2. Tech Mahindra's ability to honor pricing and meet the requirements based on mutual agreement on a project start date

BerryDunn believes the most recent competitive bid process (e.g., proposal evaluations, vendor interviews, and reference checks) was a sound approach to understanding the State's options for procuring technical services to implement the Salesforce LTC case management solution.

10.0 Impact on Analysis of Net Operating Costs

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

Table 10.1, on the following page, illustrates the impact on net operating costs.

Table 10.1: Life Cycle Costs by FY

Impact on Operating Costs	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028	Five-Year Totals
Professional Services (Non-Software Costs)						
Current Costs	$0.00	$0.00	$0.00	$0.00	$0.00	**$0.00**
Projected Costs	$683,367.97	$140,000.00	$80,000.00	$0.00	$0.00	**$903,367.97**
Maintenance and Support Costs						
Current Costs	$0.00	$0.00	$0.00	$0.00	$0.00	**$0.00**
Projected Costs	$82,000.00	$82,000.00	$82,000.00	$82,000.00	$82,000.00	**$410,000.00**
Other Costs (State Labor)						
Current Costs	$0.00	$0.00	$0.00	$0.00	$0.00	**$0.00**
Projected Costs	$1,125,459.10	$27,114.29	$27,114.29	$27,114.29	$27,114.29	**$1,233,916.26**
Baseline Annual Current Costs	$0.00	$0.00	$0.00	$0.00	$0.00	**$0.00**
Baseline Annual Projected Costs	$1,890,827.07	$249,114.29	$189,114.29	$109,114.29	$109,114.29	**$2,547,284.23**
Cumulative Current Costs	$0.00	$0.00	$0.00	$0.00	$0.00	**$0.00**
Cumulative Projected Costs	$1,890,827.07	$2,139,941.36	$2,329,055.65	$2,438,169.94	$2,547,284.23	**$2,547,284.23**
Net Impact on Professional Services	($683,367.97)	($140,000.00)	($80,000.00)	$0.00	$0.00	($903,367.97)
Net Impact on Maintenance and Support Costs and Other Costs (State Labor)	($1,207,459.10)	($109,114.29)	($109,114.29)	($109,114.29)	($109,114.29)	**($1,643,916.26)**
Net Impact on Operating Costs	($1,890,827.07)	($249,114.29)	($189,114.29)	($109,114.29)	($109,114.29)	**($2,547,284.23)**

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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 FY24 include $683,367.97 for Tech Mahindra's implementation services, other contracted professional services for implementation, and BerryDunn's Independent Review services

   - The projected costs for Professional Services include $140,000 in FY25 and $80,0000 in FY26 for Tech Mahindra's post-implementation support and maintenance

   - The projected costs for Maintenance, Support, Hardware, Hosting, and License Costs include $82,000 per fiscal year for Salesforce licenses

   - BerryDunn was not able to determine the actual costs incurred for Other Costs (State Labor) during previous project phases (e.g., exploration, initiation, and planning), so the following costs are to support the full project life cycle and are included in projected costs for FY24:

     - $24,303.20 – ADS EPMO Project Oversight

     - $413,154.40 – ADS EPMO Project Manager

     - $182,621.19 – ADS EPMO BA

     - $191,648.09 – ADS EA

     - $48,606.40 – ADS Security Staff

     - $265,125.82 – Other ADS IT Labor

   - The projected costs for Other Costs (State Labor) include $27,114.29 per fiscal year starting in FY25 for State IT Labor to Operate and Maintain the Solution

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.**

   DVHA will use 90% federal funds and 10% State funds for the one-year implementation and 75% federal funds and 25% State funds for all ongoing operating costs.

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 a net annual increase in operational costs after implementation with no break-even point since the solution is not replacing an existing system.

Figure 10.1: Baseline Current and Baseline Projected Costs
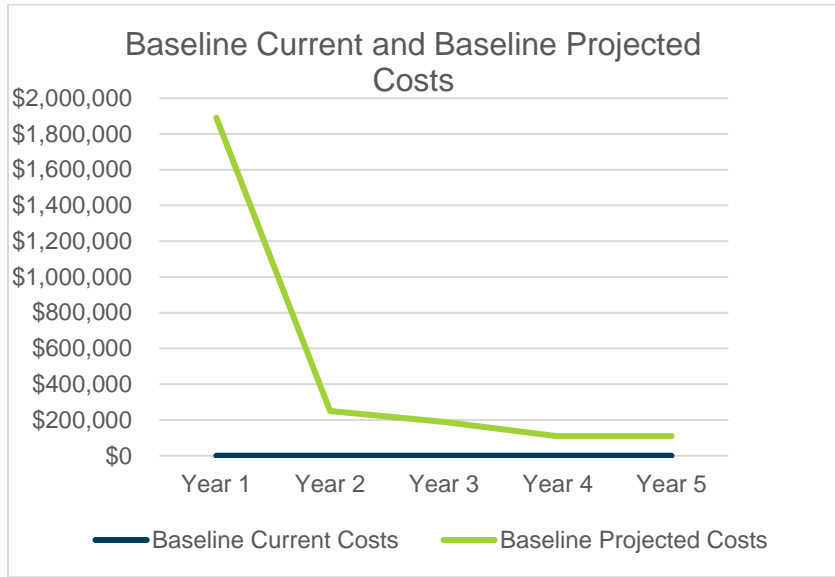
11.0 Security Assessment

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

   Salesforce has its own information security controls, which will include the following:

   - Organization-Level Security

   - Object-Level Security

   - Field-Level Security

   - Record-Level Security

   BerryDunn identified one risk related to the security controls for PII and PHI. Please see Risk #5 in Attachment 2 – Risk Register.

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

   Salesforce includes security mechanisms for data classification and privacy. Salesforce's Platform Encryption will allow the State to natively encrypt data classified as sensitive, confidential, or proprietary. Tech Mahindra stated in its proposal and interview session that the solution meets both external and internal data compliance. The proposed solution provides the capability to set encrypted data permissions to protect sensitive data from unauthorized users.

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

   Tech Mahindra's proposal states it will adhere to both its own security breach policy as well as the State's. Tech Mahindra's cybersecurity team will report on any malicious activity, which will be tracked by the Tech Mahindra firewall. These reports will go to Tech Mahindra's security team to discuss with the State and develop remediation actions.

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

   Salesforce has a risk management monitoring responsibility incorporated as a key component of its charter. Salesforce's program supplements other processes such as a comprehensive risk assessment, IT controls and compliance programs, business continuity planning, physical security programs, crisis management teams, internal audits, and legal review.

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

   Attachment D in the draft contract requires Tech Mahindra to run quarterly vulnerability assessments and promptly report results to the State. It also requires Tech Mahindra to

remediate all critical issues within 90 days, all medium issues within 120 days, and low issues within 180 days. Once remediation is complete, testing will be performed again.

12.0 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 risks 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 LTC Case Management Project.

Table A.1: Life Cycle Analysis

Description	Initial Implementation	Maintenance	Maintenance	Maintenance	Maintenance	Total
	FY24	FY25	FY26	FY27	FY28	
Implementation Services	$404,000.00	$0.00	$0.00	$0.00	$0.00	**$404,000.00**
Licenses	$82,000.00	$82,000.00	$82,000.00	$82,000.00	$82,000.00	**$410,000.00**
Other Professional Services						
Other Contract Professional Services for Implementation	$254,867.97	$0.00	$0.00	$0.00	$0.00	**$254,867.97**
Maintenance and Support	$0.00	$140,000.00	$80,000.00	$0.00	$0.00	**$220,000.00**
State Labor Costs						
ADS EPMO Project Oversight	$24,303.20	$0.00	$0.00	$0.00	$0.00	**$24,303.20**
ADS EPMO Project Manager	$413,154.40	$0.00	$0.00	$0.00	$0.00	**$413,154.40**
ADS EPMO BA	$182,621.19	$0.00	$0.00	$0.00	$0.00	**$182,621.19**
ADS EA	$191,648.09	$0.00	$0.00	$0.00	$0.00	**$191,648.09**
ADS Security Staff	$48,606.40	$0.00	$0.00	$0.00	$0.00	**$48,606.40**
Other ADS Labor	$265,125.82	$0.00	$0.00	$0.00	$0.00	**$265,125.82**
Other State Labor to Operate and Maintain the Solution	$0.00	$27,114.29	$27,114.29	$27,114.29	$27,114.29	**$108,457.16**
Totals						
Implementation Costs & State Labor Costs	**$1,866,327.07**					**$1,866,327.07**
BerryDunn IR	**$24,500.00**					**$24,500.00**
Total Implementation	**$1,890,827.07**					**$1,890,827.07**

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Description	Initial Implementation	Maintenance	Maintenance	Maintenance	Maintenance	Total
	FY24	FY25	FY26	FY27	FY28	
Total Life Cycle Operating Costs	■	$249,114.29	$189,114.29	$109,114.29	$109,114.29	$656,457.16
Total Life Cycle Costs to be Paid With State Funds	$189,082.71	$62,278.57	$47,278.57	$27,278.57	$27,278.57	$353,197.00
Total Life Cycle Costs to be Paid With Federal Funds	$1,701,744.36	$186,835.72	$141,835.72	$81,835.72	$81,835.72	$2,194,087.23

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 Rating Criteria			
Scale	Low	Medium	High
Impact	Condition does not impact quality and is unlikely to impact achievement of project objectives. -OR- Condition might be mitigated through adjustment in effort to avoid impacts to project objectives.	Condition might be mitigated through reduction or deferral of baseline scope to avoid impact to quality and/or moving date of key milestone. -OR- Condition might be mitigated by focused corrective actions to help ensure achievement of project objectives.	Condition might require acceptance of agreed-upon modifications to avoid impact(s) to key project objectives. -OR- Conditions might introduce risk to project scope, quality of work products, system solution and/or user experience.
Likelihood	1 – 39%	40 – 89%	90 – 100%

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

Source of Risk: Documentation Review and Interviews with the State

Risk Description: The State and Tech Mahindra have not agreed on financial penalties for service level agreements (SLAs), which could result in an increase in the projected ongoing costs or delay contract execution and the overall project timeline.

As part of contract negotiations, the State proposed service level credits to help ensure that Tech Mahindra complies with the State's SLAs. Due to the lack of an ITIL compliant tool, tracking and monitoring SLA measurements is manual, and Tech Mahindra did not factor in the administrative overhead into the proposed support and maintenance costs.

Tech Mahindra proposed an alternate approach, which is an incentive model that would discount an upfront amount of $20,000, and at the State's discretion payment would be made based on SLA compliance. This approach puts the responsibility on the State to track and monitor SLA measurements. It was also indicated that the State's Attorney General Office (AGO) might not approve this approach.

The overall project timeline could be delayed due to prolonged contract negotiations or Tech Mahindra might increase the proposed costs for support and maintenance if the proposed alternate approach is not approved by the State.

State's Planned Risk Strategy: Mitigate

State's Planned Risk Response: Meeting with selected vendor to provide decision on SLA service level credits.

Timing of Risk Response: On or preferably before Fri, 6/23, or Fri, 6/30 at the latest.

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

Updates Discussed During Presentation of Findings: The State has come to agreement with Tech Mahindra on the service level credits and the draft contract has been updated accordingly. ADS will use the available tools (e.g., support tickets, time/date stamp in Azure DevOps and email communications, etc.) to monitor adherence to the SLAs in the contract.

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

Source of Risk: Documentation Review

Risk Description: Tech Mahindra might assign key staff that do not have comparable skillsets and experience to staff originally proposed, which could impact the quality of work products and deliverables.

In the technical proposal evaluated by the State's proposal evaluation team, Tech Mahindra stated that it is committing an A+ team for this project based on skillset, expertise, and relevant experience working with large modernization projects at the State of Vermont. However, Tech Mahindra confirmed in the draft contract and in an interview with the proposed Account Manager and Project Manager, key staff will not be provided until a contract start date is confirmed. Due to the required review of the contract by the Centers for Medicare & Medicaid Services (CMS), an actual start date cannot be

Risk #: 2	Risk Likelihood/Probability: Medium	Risk Impact: High	Overall Risk Rating: High
confirmed until CMS approves the contract. If Tech Mahindra's proposed key staff are not available, finding available resources with comparable skillset and experience might be challenging.			
State's Planned Risk Strategy: Accept			
State's Planned Risk Response: State accepts the risk and will extend the project schedule as needed to ensure the quality of work products meet the needs of the State.			
Timing of Risk Response: After CMS review and before Contract approval.			
Reviewer's Assessment of State's Planned Response: BerryDunn recommends that the State consider asking for resumes of proposed key staff to help ensure that the Tech Mahindra team has the skillset and experience in alignment with the State's staffing expectations.			
Updates Discussed During Presentation of Findings: The State does not have concerns with the vendor resources Tech Mahindra will assign to the LTC case management project.			

Risk #: 3	Risk Likelihood/Probability: Medium	Risk Impact: Medium	Overall Risk Rating: Medium
Source of Risk: Interview with Vendor			
Risk Description: The current project timeline might not allow sufficient time to complete all key activities. The project has a 22-week implementation timeline, which includes one week for system integration testing (SIT), two weeks for user acceptance testing (UAT), and two weeks for user training. Any delays in completing the project activities could result in slippage in the overall project timeline or alternatively, the push to complete the key activities within the current project timeline could result in inadequate quality of the system or Tech Mahindra's project deliverables.			
State's Planned Risk Strategy: Avoid			
State's Planned Risk Response: Amend contract to extend project schedule if needed to ensure completion of all activities.			
Timing of Risk Response: As needed.			
Reviewer's Assessment of State's Planned Response: BerryDunn understands that the State has the flexibility to extend the project schedule, but we recommend discussing this with Tech Mahindra as there may be impact to the contract with Tech Mahindra.			
Updates Discussed During Presentation of Findings: Both ADS and DVHA confirmed that the LTC case management project is a high priority, and the necessary staff will be available when needed throughout the project to avoid any slippage in the overall project timeline.			

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

Source of Risk: Interviews with the State

Risk Description: The State might not have the business and/or technical staff to participate in the project due to competing priorities, which could delay the project timeline.

Tech Mahindra has proposed an Agile approach to the project, which requires the State's business and technical staff to be engaged iteratively throughout the project. ADS staff assigned to the project are also working on other IT projects and DVHA staff have operational responsibilities, including the Medicaid Eligibility unwind of the recent Public Health Emergency (PHE). If State staff are not available to actively participate in the project when needed, the project timeline could be delayed.

State's Planned Risk Strategy: Mitigate

State's Planned Risk Response: Amend contract to extend project schedule to ensure engagement of State business and/or technical staff.

Timing of Risk Response: As needed.

Reviewer's Assessment of State's Planned Response: BerryDunn understands that the State has the flexibility to extend the project schedule, but we recommend discussing this with Tech Mahindra as there may be impact to the contract with Tech Mahindra.

Updates Discussed During Presentation of Findings: DVHA confirmed that the LTC case management project is a high priority, and the necessary staff will be available when needed throughout the project. ADS confirmed that the EPMO staff are dedicated to the project based on the hours outlined in the draft IT ABC form and ADS is working on filling the primary Salesforce Delegate Admin position, which has been identified as a required for operations after go-live.

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

Source of Risk: Interviews with the State and Vendor

Risk Description: Unauthorized users or vendor resources could access PII and/or PHI.

Unauthorized end users or Tech Mahindra's technical offshore team could have access to PII and/or PHI if the Salesforce solution is not configured correctly or there is access to production and stage environments.

State's Planned Risk Strategy: Avoid

State's Planned Risk Response: Ensure the configuration of the solution and access to the stage and production environments prevents unauthorized users from accessing PII and PHI.

Timing of Risk Response: Final sprint before go-live.

Reviewer's Assessment of State's Planned Response: In addition to the planned risk response, BerryDunn recommends that the State clearly articulate requirements related to PII and PHI data, perform testing during UAT, and monitor the vendor's technical resources that have access to the stage and production environments.

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

Updates Discussed During Presentation of Findings: ADS explained that the stage environment should not have any PII or PHI, and there are existing controls within the State's Salesforce platform that will allow ADS to monitor who has access to the production environment.