



# Rhode Island UHIP Response to CMS/FNS Questions

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## CMS Questions

### #1: Section 2 / Results of Activities Included in the IAPD

*This section provides no current status of any activities as approved in the IAPD. Rather it focuses on a re-allocation of resources and the proposed budget. The SA should be able to summarize how much of Release 7 was successful and call out the findings from the February Assessment; i.e. the Recovery Goals – things have evolved since February. This should be in the IAPDU not in a document that is 4+ months old.*

#### **Rhode Island Response #1**

The narrative of the FFY 2018 IAPD submission has been updated to comply with the request of CMS.

### #2: Section 6: Nature and Scope of Activities

*The State could elaborate on the ‘evolved implementation approach’ and lessons learned. To the extent not addressed by the above response, the IAPDU should describe the state’s broad project goals as well as its KPIs, how they were chosen, when measurement began or will begin, progress made to date, and whether formal processes exist for revising either list.*

#### **Rhode Island Response #2**

Please see FFY 2018 IAPD submission for updated language regarding the evolved implementation approach and lesson learned. This will also describe the states projects goals, including KPIs.

### #3: Section 7: Project Management Planning and Procurement

*The interim governance structure introduced in February 2017 should be described in the IAPDU, along with any subsequent changes and the steps that have been: will be taken (e.g., the engagement with KPMG) toward a permanent governance model with clearly defined agency/functional roles and responsibilities.*

#### **Rhode Island Response #3**

The narrative of the FFY 2018 IAPD submission has been updated to comply with the request of CMS.

### #4: Section 8: Personnel Resource Statement

*42 CFR 433.112(b)(19) requires that states identify their key state personnel assigned to each major project by name, role, and time commitment; a list of names, titles and time commitments was provided with the October 2016 IAPDU resubmission but departmental affiliations and indicators of key leadership responsibilities (as well as the nature of those responsibilities) were absent. Please update the chart as appropriate, consistent with the information requested under Sections 10.1.2, 10.1.3 and 10.2.1 below.*

#### **Rhode Island Response #4**

This is addressed in the FFY 2018 IAPD in Attachment C – Staffing, which lists all staff by agency, title and cost as well as Section 10.1.1 where key state personnel and their leadership responsibilities are shown.

#### **#5: Section 9: Proposed Activity Schedule**

*A current activity schedule and planned future activity schedule was not included – this is a required component of an IAPDU. This could be satisfied with inclusion of a current runway schedule. The IAPDU should also describe the expected state of each of the key project areas at and beyond the end of the existing runway (e.g., the ends of FFY 2017, SFY 2018, FFY 2018 and/or other appropriate checkpoints). These descriptions should be in cohesive narrative form versus the bulleted capability lists by runway phase.*

#### **Rhode Island Response #5**

Please see updates to Section 9 in the FFY 2018 IAPD. The state is also submitting Attachment B – RI UHIP Timeline as part of the FFY 2018 IAPD submission, which outlines the states project runway. In addition, we are submitting Attachment D – Project Runway. This is a living document that is updated weekly and represents joint agreement between the system integrator and the State. Extension of the document beyond September is currently pending negotiations with the vendor.

#### **#6: Section 10: Proposed Budget**

*With the end of FFY 2017 rapidly approaching, there are no details to support the state's FFY 2018 budget request beyond the \$15m requested in Section 10.1.5.1. Additionally, many of the requested FFY 2017 amounts are inconsistent between the individual subsection narratives/tables and the budget in Table 3: Appendix A (see comments below).*

#### **Rhode Island Response #6**

In the FFY 2018 IAPD submission, we are providing a more detailed budget that is consistent through the document. Please see updates in Section 10 of the FFY 2018 IAPD. The budget is based on a set of assumptions regarding the status of the IES. With those assumptions, we forecasted personnel and contract support, but did not forecast the budget for the system integrator. You can see the assumptions in Section 9 and in Attachment B. The State is currently in negotiations with the system integration vendor for work in FFY 2018. The budget we are submitting will need to be revised formally in a subsequent IAPD update pending negotiations.

#### **#7: Section 10.1.2: State Personnel - All Other**

*The State should identify the responsible party for the identified stakeholders, and the leads for the project functions.*

#### **Rhode Island Response #7**

The leads for each of the project functions will be identified in the FFY 2018 IAPD submission package. Please see Section 10.1.1.

#8: Section 10.1.3: Allocated Medicaid Personnel

*Does the extra expense versus the July 2016 IAPDU reflect staff borrowed from other state agencies or otherwise brought on to assist with recovery efforts? If so, why are those individuals being charged 100% to Medicaid? (The state previously advised that ‘This staffing category [is] used for part-time project staff that are not fully allocated to the project as opposed to other staff that are fully dedicated to the project.’) Please provide additional detail (FTEs, originating departments, titles/nature of work, etc.) to justify the requested amount.*

**Rhode Island Response #8**

We have significantly reduced our estimated costs related to payroll to reflect a more accurate picture related to time spent on the project. The individuals listed below represent the staff being allocated from other agencies to UHIP Medicaid via a weekly submitted timesheet tracking the specific UHIP hours worked. Note, the table below contains individual’s full salaries not the portion that is cost allocated as these allocations will change over time.

Organization	Last Name	First Name	Job Title	2017 Salary Plus Benefits
DOA	Braca	Andrew	Senior Mgt Methods Analyst	\$68,716
EOHHS	Shaffer	Ben	Associate Direct of Plan Policy Reg	\$146,794
DOA	Daniels	Dylan	Senior Mgt Methods Analyst	\$60,310
DOA	Raymond	John	CFO	\$114,751
DOA	Coupe	Katie	Fiscal Management Officer	\$36,527
DHS	Keefe	Philip	Supervisor Child Protection	\$21,894
<b>Total</b>				<b>448,992</b>

#9: Section 10.1.4: Contracted Services (PCG)

- 1) *FNS has requested on several occasions the original contract for PCG, so as to be able to assess the proposed contract amendment submitted on May 24, 2017 for approval. Please submit.*
- 2) *Additionally, the budgeted amount is unchanged while the amendment reduces the scope of PCG’s work for the last three months of FFY 2017. Will work under the remaining scope be correspondingly expanded?*

**Rhode Island Response #9**

- 1) The original PCG contract has been included in the submission package.
- 2) The budgeted amount remains unchanged for PCG, however the scope for PCG will be expanded. During the last three months of FFY 17, the PCG team plays a pivotal role in the creation of the IAPD, including forecasting, contract analysis, future roadmap analysis, and other tasks related to IAPD for FFY 18 and responding to CMS/FNS questions.

#### #10: Section 10.1.5: Contracted Services (Deloitte)

- 1) *How was the \$5.2M base figure calculated, and does it incorporate the remaining \$2.3m Deloitte credit toward future invoices?*
- 2) *Please submit -- or identify, if previously submitted -- the contract amendment(s) which support the additional \$7,610,592 in costs; these should include the anticipated 2017 change orders. Cannot approve amendment(s) without knowing the scope and how they fall outside agreed-upon functionality (i.e., things to be delivered at no additional cost).*
- 3) *How does the requested \$12.8m correlate with the amounts in the subsequent sections? (10.1.5.1/\$5m + 10.1.5.2/\$2m + 10.1.5.3/\$3.6m + 10.1.5.4/\$1.5m + 10.1.5.5/\$1.8m = \$13.9m)*
- 4) *For the purposes of this and subsequent sections, what is the distinction between the 'Integrated Solution Adjusted' and 'Implementation Services' lines in Table 3: Appendix A?*
- 5) *How does CA41's ~\$1.1m/month of cancelled invoices for TO10/Implementation Support relate to any of the figures in this or the 10.1.5.x subsections? The amount to be billed in the remainder of FFY 2017 exceeds the amount requested for 'Implementation Support' on Table 3: Appendix A, and the discrete 10.1.5.x projects sum to well more than the amount on the 'Integrated Solution' line.*

#### **Rhode Island Response #10**

Overall, based on negotiations with Deloitte, the updated FFY17 forecast submitted in the FFY18 IAPD removes all the Deloitte spending with the exception of invoices paid in October of 2016 for a total of \$3,241,677. This is related to one month of software implementation support (September 2016) and items related to contract amendment 37.

- 1) The \$5.2 million should have been \$4,959,211 for retainage. The retainage was taken on the following Deloitte invoices all related to the original contract. The remaining \$2.3 million credit was taken against contract amendment #37 and is excluded from the forecast.

Invoice #	Billed	Retainage
8001948425	184,143	(18,414)
8001901720	797,955	(79,796)
8001964158	2,795,098	(279,510)
8002095034	2,596,370	(259,637)
8002108878	1,038,548	(103,855)
8002114935	10,128,863	(1,012,886)
8002001041	2,532,216	(253,222)
Various	6,438,333	(643,833)
8002021821	1,609,583	(160,958)
8002220578	3,324,110	(332,411)
8001978241	519,274	(51,927)
8001936418	1,038,548	(103,855)
Various	1,869,386	(186,939)
Various	7,164,806	(716,481)
Various	7,035,598	(703,560)
8002269572	519,274	(51,927)
<b>Total</b>	<b>49,592,106</b>	<b>(4,959,211)</b>

- 2) The \$7,610,592 related to an estimate of payments that could be made to Deloitte based on the contract and amendments. We estimate that \$5,319,402 would be paid against contract amendment 38 for software implementation support for April to June of 2017 and the remaining \$2,524,718 was anticipated to be paid for the remaining contract value on contract amendment 37.

Item	Amount
Retainage	\$ 4,959,211
CA37	\$ 2,524,718
CA38	\$ 5,319,402
<b>Total Deloitte</b>	<b>\$ 12,803,331</b>

- 3) The \$12.8 million does not correlate to the items below. These items were only for planning purposes and were not included in the forecast.
- 4) Integrated Solution Adjusted is the FFY17 allocation rate and Implementation Services is the FFY16 allocation rate. The lines of code allocation methodology was slightly updated from FFY16 to FFY17.
- 5) The CA41's \$1.1 million of cancelled invoices covered CA38 invoices from October 2016 to March 2017. The amount forecasted is for April to June of 2017. CA38 is difficult since the amendment splits the cost between DD&I and M&O. The new IAPD submission updates all of the numbers as discussed above.

#### #11: Section 10.1.5.1: Future Federal Requirements

- 1) *Please identify the new functionality associated with the three major DD&I releases that the State is not moving forward with in FFY17.*

- 2) *Additionally, how were the \$5m/\$15m figures identified and what new functionality does the state anticipate receiving in the next 15 months (beyond the original Release 7 scope, which Deloitte is expected to deliver as part of the warranty effort)?*
- 3) *How does the state validate vendor cost proposals?*

### **Rhode Island Response #11**

- 1) Three major releases were sent as part of RAI responses in January of 2017, please see the attached. As Turnaround leadership assessed the project and set direction for changes to the system, a Project Runway was developed. The Project Runway is a comprehensive listing of what the state and Deloitte have agreed to implement to complete the system. The items that were sent as part of the RAI response in January 2017 were assessed for criticality by new leadership and folded into the Project Runway, which is attached for reference in the FFY 2018 IAPD as Attachment D. The Project Runway is a living document that is updated as the project proceeds.

Of the twenty-three items sent in the RAI response, the following 8 have not been prioritized in the current Project Runway and are part of ongoing negotiations with the system integration vendor:

- (1) Enhancement for Entering CIOS
  - (2) Add MART Review
  - (3) Add NCP Search to Individual Search Screen
  - (4) Unverified or Unknown LPR Status and I-551 Number
  - (5) Disability Details: Form Dates
  - (6) Integration of ADAP (AIDS Drug Assistance Program) Program into RIBridges
  - (7) Automatic Enrollment of Sherlock Population into Low Income Subsidy Program.
  - (8) Adding MED ID as part of RIBridges Individual Inquiry and Case Inquiry Screen
- 2) The \$5M figure was based upon cost estimates received from Deloitte for requested functionality to be delivered in FFY 17. Please see the cost estimates for the FFY17 releases as noted in the January RAI responses.

The \$15M figure is similar in that it would provide spending authority under which the state would have been able to deliver at least three large releases in the following fiscal year. Again, as state leadership reassessed the project and its stance with Deloitte, the roadmap was folded into the Project Runway with scope and timeline detailed therein.

During the next 15 months the State expects to receive the following functionality (please see Appendix D for the full runway for additional details.

FFQ1 18 - DDI will be expended for extensive design, development and testing will be conducted in anticipation of a major release in February, 2018.

FFQ2 18 - DDI will be expended for testing and deployment of a major release in February, 2018. This release will include: changes to the Customer Portal to reduce the number of screens and questions that users encounter; changes to Notices so that reason codes are expressed in the

appropriate language; changes to the data sync protocol to reduce inconsistencies; improvements to work management tools, including the worker inbox.

FFQ3 18 - DDI will be expended for testing and deployment of a major release in June, 2018. This June release will be focused on system performance - reducing transaction times and improving data accuracy both within the system and through all of the critical interfaces.

FFQ4 18 - DDI will be expended for testing and deployment of a major release in September, 2018. This September release will be focused on improving the user experience for workers and customers. It will include navigation aids, greatly enhanced on-screen help, and in-line error checking.

FFQ1 19 - DDI will be expended for preliminary design and development of a major new version of RI Bridges, slated for release in stages through the first half of CY19.

- 3) The State evaluates the vendor estimates based on proposed scope, staffing levels, and hourly rates. We will use the State team and IV&V vendor, where applicable to validate the proposed solution and work plan against the approved requirements. We will compare the proposals to cost incurred for similar functionality during the life of the project. Where available, we will compare to spending in other states for similar services. Where further available or practical, we will ask outside consultants to prepare an estimate of cost for the service.

#### #12: Section 10.1.5.2: UHIP Security

*The IAPDU indicates that work not completed in FFY 2017 will be considered for FFY 2018. Have the projects that were removed since the July 2016 IAPDU been deferred or dropped completely (data masking, key management, endpoint protection, user access certification, privileged identity management and automated compliance tools)?*

#### **Rhode Island Response #12**

Scripts to mask production data in the testing environments have been developed and implemented by Deloitte and no additional funding is needed for this deliverable. Key management, user access certification, privileged identity management and compliance management tools have been deferred. Some of these items have been partially completed or have a manual process to satisfy the related control requirement. We have prioritized IDS/IPS, QRadar monitoring enhancements and Endpoint Management for FFY 2018 and FFY 2019.

#### #13: Section 10.1.5.3: Data Analytics

- 1) *Who developed the Data Analytics roadmap; and who will be implementing – is there a contract or amendment associated with this effort?*
- 2) *Is the decreased scope/cost due to Deloitte performing any of the work at no charge as part of the recovery effort (e.g., dashboard upgrades as part of Worker Portal / Phase 6) or has it been deferred to FFY 2018/dropped?*
- 3) *Is ‘RIBridges Program Integration’ (10.1.5.3.2) truly subject to the A-87 exception or should the cost be borne by the listed programs (SNAP, RIWorks and CCAP)?*

### **Rhode Island Response #13**

- 1) The state team developed the Data Analytics Roadmap and we currently do not have that work under contract. This is part of ongoing negotiations with the system integration vendor.
- 2) The work described in 10.1.5.3 has not yet happened and is not currently planned in the Project Runway.
- 3) The A-87 rule exception applies to technology for qualifying integrated eligibility systems for Medicaid and human service programs. This exception allows DDI costs that benefit both Medicaid and human services programs to be allocated 100% to Medicaid. Because the Deloitte system is so highly integrated, the state believes that this fits within the appropriate allocation.

### **#14: Section 10.1.5.5: Back-Office Scanning**

*Why did the cost of central scanning/EDM support increase by \$1m from the July 2016 IAPDU?*

### **Rhode Island Response #14**

The back-office scanning initiative is instrumental to helping the State make the transition to RIBridges as seamless as possible by supporting the local office workers stream-line the application intake and case maintenance processes. It also helps the State achieve the planned cost benefit goals for the new system by expediting the State's vision to achieve a near-paperless office environment. This implementation support best practice provides for scanning and storing legacy documents into the RIBridges system. This effort focuses on two critical elements;

- (1) The configuration and integration of scanned images and centrally stores those images, and;
- (2) The configuration of the increase in RIBridges electronic storage to ensure there is enough system capacity for go-live.

Additional cost of \$1,000,000 has been added to complete the scanning due to an under estimate of the volume of scanning of all necessary documents. The forecast is also being adjusted downward by \$796,483 for the credit received by Deloitte for the original scanning work performed.

### **#15: Section 10.1.8: Contracted Services – InRhodes Conversion and Bridging**

- 1) *Please confirm that the requested \$2.5m is for ongoing support of remaining InRhodes capabilities, plus UHIP project management and testing/operational support under CAs 6/7, and that CMS/FNS are in no way supporting RIKidsBridge.*
- 2) *Does the state anticipate decommissioning InRhodes completely in FFY 2018?*

### **Rhode Island Response #15**

- 1) All work supporting RIKidsBridge is allocated to Child Support Enforcement, it is not included in the \$2.5M.
- 2) It is anticipated that InRhodes will still be utilized for claim calculations prior to September 2016 and for other audit history. This is not expected to be fully available in RIBridges by the end of FFY 2018.

### #16: Section 10.1.10.3: Implementation Support Services

1. Please submit the Tabner, Wakely and Faulkner contracts for our project files. Additionally, costs should be allocated across benefitting programs based on the state's assertion (in its response to our comments on the July 2016 IAPDU submission) that the vendors will be supporting programs beyond Medicaid/HSRI.
2. Table 5's total (KPMG/Optum/BPR/IBM) is \$500k less than the corresponding amount in Table 3 / Appendix A.
3. Please confirm that the \$875k proposed for Business Process Redesign activities is to supplement the reinvestment plan dollars recently approved by FNS, versus the total cost inclusive of the reinvestment. (The reinvestment obligation of \$805,197 is not subject to Federal matching dollars -- the state can't charge 90% of 89.521% of the penalty to CMS.)

#### Rhode Island Response #16

1. The Tabner, Wakely, and Faulkner contracts have been included as part of the FFY 2018 IAPD submission package.
2. An error was made when preparing the table, the business process redesign item was removed from the overall forecast and the new table that matches the submission is as follows:

Item	Cost
KPMG	\$1,244,454
Optum	\$50,000
IBM	\$4,748,830
<b>Total M&amp;O</b>	<b>\$6,043,284</b>

3. The proposed Business Process Redesign amount listed in the table was an error and should have been forecasted in FFY18. The forecast and activities were not contemplated as part of a supplement to the reinvestment plan dollars recently approved by FNS.

### #17: Section 10.1.11: Data Management

*Please submit the Freedman contract for our files. Also, should the cost of the work be allocated beyond Medicaid/HSRI? (The state did not address this question in its responses to the initial July 2016 IAPDU inquiries.)*

#### Rhode Island Response #17

The Freedman contract has been included as part of the FFY 2018 IAOD submission package.

The work that Freedman is currently performing is split between DD&I and M&O (48/52 respectively). As the project continues to shift toward M&O, the allocations will be adjusted. As of now, the state still continues to split between DD&I and M&O as appropriate.

The data management that is performed by Freedman more directly impacts Medicaid and HSRI than any of the human service programs. For this reason, the state feels as though it is appropriate to keep the allocations the same.

#18: Section 10.1.12: Interfaces

*Please confirm that all required interfaces will be completed by the end of FFY 2017, or that the state expects Deloitte to complete them at no additional charge during FFY 2018.*

**Rhode Island Response #18**

The state can confirm that all required interfaces will be completed at no additional cost during FFY 2018.

#19: Section 10.1.13: Hardware and Software Costs

*Why did the cost of the security hardware (the only change apparent in the table) decrease by \$300,000, and why does that figure vary from the \$353,364 cited as the difference from the July 2016 IAPDU? Additionally, please confirm that the described items (both in this section and in 10.1.14) have been or will be purchased/implemented in FFY 2017.*

**Rhode Island Response #19**

Negotiations are ongoing with the system integration vendor, including go-forward hardware and software costs. Costs for FFY 2017 provided here have been updated to reflect needs identified since go-live:

Function	Description	Comment	Cost	FFY17 IAPD Update
<b>Kiosks</b>	Kiosks to offer self-service and assist with wait time. Reduce resource intensive tasks related to processing of lobby management.	Per Contract Amendment 37	\$141,059	\$141,059
<b>Development Hardware</b>	Required to support the RIBridges DD&I technical platforms/environments, including development, system testing, production staging, and user acceptance testing, testing time travel, and training environments.	Additional equipment was provided as part of Deloitte's contract.	\$1,436,569	\$0
<b>Data Analytics Hardware</b>	Required hardware for each of the data analytics projects.	Not needed	\$75,000	\$0

Function	Description	Comment	Cost	FFY17 IAPD Update
<b>Security Hardware</b>	Required hardware for each of the security enhancements projects.	WAF hardware purchase of approximately \$100,000 is expected.	\$200,000	\$100,000
<b>Web Application Firewall</b>	Detect attacks against web applications in more depth than an Intrusion Prevention System. Protect against web application threats like SQL injection, cross-site scripting, session hijacking, parameter or URL tampering and buffer overflows, etc.	Has not yet to be completed. This is to fund the implementation of the WAF tool may move to FFY18.	\$50,000	\$50,000
<b>ISP Failover Circuit</b>	Provides automatic failover of the ISP.	Yet to be completed may move into FFY18.	\$30,000	\$30,000
<b>DR Circuit</b>	Circuit connection to the site location for disaster recovery.	Completed	\$30,000	\$30,000
<b>VPN Configuration for MFA</b>	Provides secure access for contact center users until point to point connection is installed.	Not needed	\$19,704	\$0
<b>Contact Center Network Circuit</b>	Point to point connection between the contact center and the Warwick data center. Circuit will be used to access the worker portal on the state network. This will provide a dedicated, stable and secure connection that does not require MFA authentication.	Not done, but is still needed and will be done this federal fiscal year (2017) \$954/month	\$4,732	\$2,862
<b>Total</b>			<b>\$1,987,064</b>	<b>\$353,921</b>

#### #20: Section 10.1.14: COTS Costs

*The state indicated that these costs would be allocated to both Medicaid and human service programs (versus just Medicaid) in its response to our initial July 2016 IAPDU questions.*

#### **Rhode Island Response #20**

With all the system issues after go-live we have updated our commercial off the shelf software (COTS) requirements as follows. The only item that is remaining to be purchased is the security software that

will be re-forecasted in FFY18. We will adjust our allocation methodology since the software will benefit both Medicaid and FNS programs.

Function	Description	Comment	Cost	FFY17 IAPD Update
<b>Performance Testing Tool</b>	Provide dynamic performance information.	Not needed	\$3,000	\$0
<b>Data Analytics</b>	COTS software required for each of the data analytics enhancements.	Part of the Deloitte Contract	\$100,000	\$0
<b>Security</b>	COTS software required for each of the security enhancement projects.	Purchase the services to implement the IDS/IPS this year. BRR has been submitted and is under evaluation for cost. Purchase the following next Federal fiscal year for approximately: Q-radar upgrade and Public Key management	\$750,000	\$0
<b>Business Intelligence Tool</b>	Business Intelligence tools foster easy access to relevant information and support the development and distribution of a variety of reports. Simplified access to data and the ability to consolidate information across multiple data sources will enable the State of Rhode Island to improve workforce productivity and speed decision-making. An Enterprise Business Intelligence tool will help State of Rhode Island stakeholders gain a greater understanding of the data that is available.	This Tableau Software is for the Data Mart; purchased from Deloitte.	\$300,000	\$0
<b>Total</b>			<b>\$1,153,000</b>	<b>\$0</b>

### #21: Section 10.2.1: State Personnel – DHS Eligibility Support

- 1) *How were the original June 2016 and updated May 2017 figures determined (FTEs, titles, etc.)?*
- 2) *The costs should be allocated beyond 100% Medicaid, based on the state's assertion (again in its response to our initial questions on the July 2016 IAPDU) that '[t]he two staff groups identified, Eligibility Technician and Supervisor, will work all programs contained in the integrated eligibility system.'*

#### **Rhode Island Response #21**

- 1) Please see attachment C last page in the FFY18 IAPD submission for the exact names and titles for the personnel. We listed the employees in groups by title.
- 2) The overall objective is to accurately reflect the true Medicaid costs. The approach we took to allocate the personnel (as shown in Appendix C) was to list the entire number of additional staff needed to stabilize the system. We then removed the staff directly related to our RI Works program. Then we used a 60/40 split between Medicaid and other human services programs on the remaining personnel cost. We also chose not to include in the IAPD 40% of the other human services personnel costs.

### #22: Section 10.2.2: State Personnel – EDM Scanning and Indexing

*Can the state update the M&O cost allocation for FFY/SFY 2018, given the significant system changes since the current rates were introduced in the July 2015 IAPDU? (It's just one data point, but information provided by DHS in mid-May 2017 indicated that ~51% of applications received at the central scanning facility were for SNAP.) This also applies to Sections 10.2.3, 10.2.6 and 10.2.7.*

#### **Rhode Island Response #22**

An updated cost allocation methodology will be included in the FFY 2018 IAPD submission package.

There is no cost for EDM Scanning and Indexing for FFY2018 and beyond. No funds for FFY 2017 were spent on this effort.

### #23: Section 10.2.3: M&O – Other

- 1) *Is the state interested in updating the requested notice costs, given that nearly twice as many notices were issued in the nine months since launch as were projected for the entire year? (If so, please reaffirm that postage is not claimed at enhanced Medicaid FFP.)*
- 2) *Has the automated regression test tool been implemented?*

#### **Rhode Island Response #23**

- 1) The state has decreased the cost of notices for FFY 2018 based on actual dollars spent. This is included in the IAPD narrative in section 10.2.2.
- 2) The automated regression test tool has not been implemented at this time. The state is reviewing options for automated regression.

#24: Section 10.2.4: Contracted Personnel – Reconciliation

- 1) Please provide a copy of the Xerox contract.
- 2) 'Review data for the purpose of federal claiming', sounds like a general administrative activity not reimbursable with enhanced FFP; please elaborate on the nature of the task if its link to eligibility determination is not clear in the contract.

**Rhode Island Response #24**

- 1) Xerox contract has been submitted as part of the IAPD FFY 2018 submission package.
- 2) Xerox is a part of a team that is triaging and addressing inaccuracies and discrepancies based on challenges with the integrated eligibility system. It is an implementation support activity. In reviewing data for the purpose of federal claiming, they need to review RIBridges transactions and transaction errors in processing correct eligibility determinations and help reconcile program eligibility and enrollment transactions.

#25: Section 10.2.5: Data Management

*Notwithstanding the overall need for additional FFY 2018 detail, why are costs expected to increase if InRhodes/Phase 1 > Phase 2 data conversion will (at least theoretically) be complete by then, data integrity initiatives will have reduced the need for manual intervention, and the frequency of releases will have decreased as the system stabilizes? (This question was asked in our initial set of inquiries on the July 2016 IAPDU submission, but the state's response was unclear.)*

**Rhode Island Response #25**

The increased costs are attributed to vendor management and oversight of UHIP project processes including data review board, maintenance/release planning committees, and oversight for UHIP "critical projects" including Health Coverage Backlog, Worker Portal, Customer Portal, and Data Project.

The state is continuing the shift the Data Management scope of work toward M&O over FFY 2018. Additional detail will be included in the FFY 2018 IAPD Submission package.

#26: Section 10.2.7: Contracted Services – UHIP Technology Platform

<b>Tables 10/3 and Appendix A are inconsistent with the amounts in CA41's list of cancelled invoices, potentially understating O&amp;M costs by \$9m/year:</b>		
<b>Item</b>	<b>Table 10</b>	<b>CA41</b>
TO7/Hosting	\$180k/yr	\$178k/mo = \$2.1m/yr
TO8/M&O+SW	\$720k/yr	\$706k/mo = \$8.5m/yr
TO9/FinMgt	\$3.5m/yr	\$231k/mo = \$2.8m/yr
<b>Annual Total</b>	<b>\$4.4m</b>	<b>\$13.4m</b>
<b>DLT Credit</b>	<b>(\$3.4m)</b>	<b>(\$6.7m)</b>
<b>Net FFY 2017</b>	<b>\$975k</b>	<b>\$6.7m</b>

**Rhode Island Response #26**

Below is a full reconciliation of CA38 with the credit of invoices. We have updated our forecast for Deloitte implementation support services and ongoing hosting/M&O to reflect the corrected amounts.

	July 2016 - June 2017	Invoices Rec. / Credit	Invoices Rec / Not Paid	No Cost Mths per 6/30/2016 memo	
	Total Contract	Oct-Mar	Apr-Jun	Jul-Sep	Total FFY 2017
Task Order 7 Implementation	\$1,897,373	\$948,687	\$474,343	\$0	\$474,343
Task Order 7 Operations	\$234,507	\$117,254	\$58,627	\$0	\$58,627
Task Order 8 Implementation	\$6,541,286	\$3,270,643	\$1,635,322	\$0	\$1,635,322
Task Order 8 Operations	\$808,474	\$404,237	\$202,119	\$0	\$202,119
Task Order 9 Implementation	\$0	\$0	\$0	\$0	\$0
Task Order 9 Operations	\$2,769,348	\$1,384,674	\$692,337	\$0	\$692,337
Task Order 10 Implementation	\$12,830,160	\$6,415,080	\$3,207,540	\$0	\$3,207,540
Task Order 11 Operations	\$1,128,002	\$564,001	\$282,001	\$0	\$282,001
<b>Total</b>	<b>\$26,209,150</b>	<b>\$13,104,575</b>	<b>\$6,552,288</b>	<b>\$0</b>	<b>\$6,552,288</b>
DD&I	\$21,268,819	\$10,634,410	\$5,317,205	\$0	\$5,317,205
M&O	\$4,940,331	\$2,470,166	\$1,235,083	\$0	\$1,235,083
<b>Total</b>	<b>\$26,209,150</b>	<b>\$13,104,575</b>	<b>\$6,552,288</b>	<b>\$0</b>	<b>\$6,552,288</b>
<b>Original Submission</b>	<b>July Submission</b>	<b>May Submission</b>	<b>Updated July 2017</b>		
DD&I	\$20,625,000	\$5,319,402	\$5,317,205		
M&O	\$4,589,999	\$974,806	\$1,235,083		
<b>Total</b>	<b>\$25,214,999</b>	<b>\$6,294,208</b>	<b>\$6,552,288</b>		

**Ongoing Hosting and Maintenance and Operations (Updated Costs)**

Item	Cost
Hosting Operations TO7	\$175,880
Maintenance & Operations TO8	\$606,356
Financial Management Services TO9	\$2,077,011
Annual Maintenance	\$846,002
Deloitte Credit	(\$2,470,166)
<b>Total M&amp;O</b>	<b>\$1,235,083</b>

**#27: Section 10.2.8: Contracted Services – Contact Center**

- 1) Please clarify the amount requested – the narrative cites an additional \$788k but Table 3 / Appendix A reflects a \$3.7m increase, while the AHS amendment approved on 5/8/2017 was for an additional \$2.5m. Does the added expense include the additional testing scope that was considered in May 2017?
- 2) The state previously indicated that AHS was documenting call volume to support a more precise allocation of costs between eligibility-related activities (75% Medicaid FFP) and general beneficiary education, plan choice and enrollment (50% Medicaid FFP), and that the results would be provided in the next IAPDU. Is that process still underway?

**Rhode Island Response #27**

- 1) The current IAPD submission reflects the most updated forecast for AHS. Our current forecast for FFY17 M&O is \$14,407,334, which is \$5,109,904 higher than the July FFY 2017 IAPD submission due to continued backlog and escalation support until August 2017, which makes up a majority of the variance, and customer service support for Level 1 calls.
- 2) The process to document call reasons has begun, and is still underway. The state is working with the AHS to develop the reports needed to accurately analyze call reasons. The reporting hasn't stabilized due to the ongoing system issues. It will continue to be reviewed, and the cost allocation will be adjusted as seen fit.

## #28: Section 11: Cost Allocation Plan for Implementation Activities

*The current DDI cost allocation was introduced in the July 2015 IAPDU and has not markedly changed since then, although it was based on an analysis of InRhodes code that appears to have first been presented in January 2013. CMS embraces the intent of the A-87 exception but we're concerned that InRhodes may no longer be an appropriate starting point given that RIBridges/Phase II is in production; we're also concerned that significant RI, Deloitte and other vendor resources have gone toward activities since go-live that are specific to non-Medicaid programs (EBT, interfaces, CCAP payments, etc.). Please rebaseline the DDI cost allocation based on current or SFY 2017-end RIBridges code (or commit to doing so at the end of FFY 2017); we would also like the state to propose a means of identifying program-specific recovery costs for assignment to those programs.*

### **Rhode Island Response #28**

An updated cost allocation methodology will be included in the FFY 2018 IAPD submission package in section 11.

## #29: Section 14/ Required Assurances

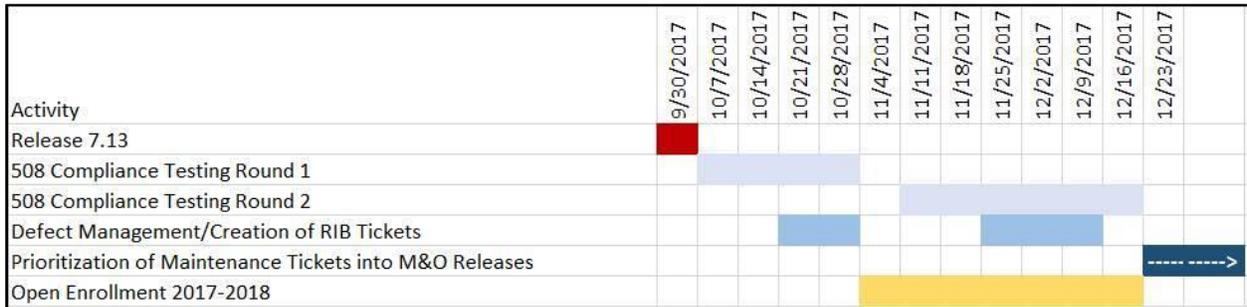
*42 CFR 433.112(b)(12) requires accessibility in accordance with Section 508 of the Rehabilitation Act, but IV&V reports have repeatedly noted persistent accessibility defects (despite Deloitte's 6/21/2017 attestation of compliance). How is the state ensuring/promoting accessibility between now and the anticipated re-test in October, and can Deloitte be required to produce evidence of a self- or third-party assessment prior to future major releases?*

### **Rhode Island Response #29**

Below is a high level description of the IES Accessibility Testing Plan.

- Test Cases were created for four different types of Accessibility testing;
  - JAWS
  - WAVE
  - Total Validator
  - Keyboard Accessibility
- All the issues will be reported in JIRA for triage.
- Exceptions from WAVE/Total Validator will be reviewed against the attached exclusion list and based on that defects will be logged

- Defects will be created as Maintenance Tickets and prioritized in subsequent M&O Releases
- Final attestation will be submitted to Rhode Island
- Findings from the testing that require code modifications will be created as Maintenance Problem Tickets and prioritized through the Maintenance Prioritization Committee.
- The Open Enrollment Period for 2017-2018 will need to be taken into consideration for the prioritization of any findings that arise from the 508 Compliance Testing as typically a code freeze is in place. The dates for OE 2017-2018 are highlighted in the timeline below.



## FNS Question

### #1: Condition 1

*Provide detailed reconciliation of functionality delivered and costs for design, development and testing for ABAWD, eDRS, Mass Benefit Replacement, NDNH, Disaster SNAP and Claims Processing. This documentation must include dates of:*

- Receipt of Deloitte deliverables*
- Rhode island acceptance and payment for same*

*FNS has determined that Condition 1 remains largely incomplete, as Deloitte has not delivered the full functionality as part of Release 7, nor has the State submitted documentation as requested. Deloitte Contract Amendment CA 31 executed May 12, 2015 was focused on Requirements Validation Sessions and Functional Design documents. This work was to be completed August 31, 2015. Deloitte Contract Amendment 35 was to implement the development from CA 31; with an end date of February 2016. We have reviewed progress to date against Condition 1 and have the remaining requests.*

- Provide a written summary of the ability to provide, or not to provide the documentation originally requested.*
- Please confirm that Mass Benefit Replacement and NDNH are complete and functioning with the implementation dates; and that no defects exist.*
- ABAWD, D-SNAP, eDRS, and Claims are all in some stage of development; please provide most current state of each.*

### Rhode Island Response #30

- 1) We believe that the responses below and the attached amendments are responsive. Each of the areas that have been requested are included across several change orders in phases, and are not

typically broken out separately by module/function. The contracts that include this functionality are CA31, CA34A, CA34B, CA35 and CA37 and are included as a part of the submission package. Payments for these items align with the contracts, minus the retainage associated with each. The Mass Benefit Replacement functionality was tested and deployed in September 2016. It is currently functioning with no known defects. The NDNH Interface was deployed in the March 2017 release on April 1, 2017. It is active in Production and fully functioning with no known defects. Please see the table below for more details, as well as the amendments, attached.

- 2) The Mass Benefit Replacement functionality was tested and deployed in September 2016. It is currently functioning with no known defects. The NDNH Interface was deployed in the March 2017 release on April 1, 2017. It is active in Production and fully functioning with no known defects.
- 3) Development is ongoing for each of the functionalities listed above. Additional claims functionality is on track to be delivered as part of the 8/26 and 9/16 releases. Two data fixes are currently in UAT will be added to production when State sign-off is received. However, these data fixes should not impact the dates to implement the additional claims functionality. Below is a brief summary of the current status of each functionality:
  - **ABAWD:** ABAWD is currently undergoing State User Acceptance Testing and is included as part of Deloitte’s R7.11 enhancement release planned for 8/26. The FNS team will be onsite on August 22 to participate in validation for ABAWD functionality.
  - **D-SNAP:** DSNAP Approvals and Denials functionality completed State User Acceptance testing and was delivered as part of Deloitte’s R7.9 enhancement release on 7/29. DSNAP QC is currently undergoing State User Acceptance Testing and is included as part of Deloitte’s R7.11 enhancement release planned for 8/26.
  - **eDRS:** eDRS interfaces are developed and UAT tested; a number of comments from FNS were addressed and are being tested in UAT. eDRS interfaces are scheduled to be delivered into production as part of 8/26 release, contingent on FNS approval.
  - **Claims:** Additional claims functionality is on track to be delivered as part of the 8/26 and 9/16 releases. Two data fixes are currently in UAT will be added to production when State sign-off is received. However, these data fixes should not impact the dates to implement the additional claims functionality.

Area	Initial Design Submission Date	State Design Approval Date (Most Recent)	Cost (design, dev, testing)	Production Date
<b>ABAWD*</b>	8/13/2015	8/7/2017	These functions are included as components of CA31, CA34A, CA34B, CA35 and CA37.	8/26/2017
<b>eDRS*</b>	7/7/2015	8/16/2017		8/26/2017
<b>Mass Benefit Replacement</b>	7/27/2015	9/10/2015		9/13/2016
<b>NDNH</b>	7/27/2015	6/21/2017		4/1/2017
<b>Disaster SNAP*</b>	8/27/2015	6/13/2017		8/26/17
<b>Claims Processing*</b>	5/10/2013	8/7/2013	Claims processing is a component of the base contract.	8/26/2017, 9/16/2017

\*While this functionality was part of the initial requirements, these dates reflect the latest design updates and associated production dates

#2: Condition 2

FNS may consider this condition met once we review the plan mentioned on the June 2, 2017 call between the State/CMS/FNS. The state informed its Federal partners that Deloitte had submitted a proposal to fix UHIP with 4 major releases July - September 2017. We should see that plan soon for review and approval as the contract end date with Deloitte is July 30, 2017.

\* Please note in our March 2017 letter we conveyed that submitted documentation consisted of the December 7, 2016 JIRA P1-P4 spreadsheet. The reply indicated that the P1-P4 spreadsheet was provided weekly and it was unknown how many fixes there would be under warranty. Post implementation status calls and reports indicated defects that had been fixed and tested were appearing again. A comprehensive list of all defects fixed under warranty, included release date should be submitted.

**Rhode Island Response #31**

The system release plan for July – September 2017 is reflected in the Project Runway and in bi-monthly incident and problem ticket releases. Please see Attachment D of the FFY 2018 IAPD for the Project Runway. See the attached spreadsheet for a comprehensive list of all defects fixed under warranty since September 2016.

The breakdown of the total resolved defects is as follows:

Month	Count of Resolved
<b>September</b>	838
<b>October</b>	1952
<b>November</b>	2049
<b>December</b>	2226
<b>January</b>	2529
<b>February</b>	1367
<b>Total</b>	<b>10,961</b>

We are also attaching to this RAI response a complete list of problem tickets, including those scheduled for release on August 26, 2017. The state will continue to prioritize these for the bi-weekly releases according to program impact through the Maintenance Prioritization Committee meetings.

We currently have 1179 open problem tickets.

Agency	Count
<b>DHS</b>	455
<b>HSRI</b>	408
<b>Deloitte</b>	221
<b>EOHHS</b>	91
<b>DoIT</b>	3
<b>DOA</b>	1
<b>Total</b>	<b>1179</b>

## List of Attachments

### Contracts

As part of the submission package, the state has provided the following contracts as a separate PDFs;

1. Deloitte
2. Faulkner Consulting Group
3. Freedman Consulting, LLC
4. Public Consulting Group, Inc.
5. Tabner Global
6. Wakely Consulting Group
7. Xerox

### Supporting Documentation

The state has also provided the following documentation as requested;

1. Complete list of defects fixed under warranty
2. Complete list of problem tickets