Submitted to Large Project Oversight on 10/21/20

GENERAL INFORMATION

Program/Project Name: Eligibility System Modernization/SPACES

Agency Name: Department of Human Services (DHS)

Project Sponsor: Michele Gee **Project Manager:** Val Brostrom

PROJECT DESCRIPTION

The Department of Human Services currently determines eligibility for medical assistance, cash assistance, supplemental nutrition, child care assistance and heating assistance in four separate information systems. Two of these systems will be heavily impacted by the modifications required to comply with the 2010 Patient Protection & Affordable Care Act (ACA) passed by Congress in March 2010. The ACA legislation will broadly expand Medicaid coverage to nearly anyone with an income up to 138% of the federal poverty level (no longer limited to low-income children, pregnant women and disabled adults). The objective of this project is to replace the current eligibility systems with a single system that will meet the requirements of the ACA as well as streamline the application process for constituents.

BUSINESS NEEDS AND PROBLEMS

- 1. Incorporation of ACA requirements to meet compliance date of January 1, 2014; allowing for initial enrollment by October 1, 2013 with the completion of the entire system by December 31, 2015.
- 2. The Centers for Medicare & Medicaid Services (CMS) has issued new standards and conditions that must be met by the states in order for Medicaid technology investments for eligibility systems to be eligible for the enhanced federal funding percentage (i.e. 90% federal matching percentage rate).
- 3. A single eligibility system for all economic assistance programs which provides for sharing of information regarding clients interactively amongst its service programs resulting in increased efficiency, ease of use, mobility of the application, and effective reporting for decision making.

PROJECT FORMAT

Program/Project Start Date: 5/7/2013

Budget Allocation: \$45,436,315. All Medicaid related and common functionality costs qualify for Federal Financial Participation of 90%; state match of 10%. Approximately 80% of the system build leverages these federal matching funds.

How Many Phases Expected at Time of Initial Start Date: The project will be broken into two major iterations, with the first phase being the required ACA functionality and the second being the remaining programs (Medicaid ABD, Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), Child Care Assistance Program (CCAP), and Low Income Home Energy Assistance Program (LIHEAP)).

Phased Approach Description: The ACA functionality will be iteration 1 and will be released immediately upon completion (Release 1). The remaining iterations will include functionality for Medicaid (age, blind, disabled), Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), child care assistance, and Low Income Home Energy Assistance Program (LIHEAP). These subsequent iterations will be released to production at the same time, when all have been completed (Release 2).

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Estimated End Date for All Phases Known at Time of Initial Start Date: Q3 2018

PROJECT ROAD MAP

The project road map shows the high-level plan or vision for the program/projects/phases. It is intended to offer a picture of the lifespan of all the effort that is expected to be required to achieve the business objectives.

Project or Phase	Title	Scope Statement	Estimated Duration (months)	Estimated Budget
Iteration 1	ACA/Release 1	This includes business functionality to support the Affordable Care Act.	34.9 months	\$45,436,315 Re-baselined to \$50,943,770
Iteration 2	Release 2	The remaining business functionality for Medicaid age, blind, disabled (ABD), Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), child care assistance, and Low Income Home Energy Assistance Program (LIHEAP) including the requirements validation, construction, system integration testing, user acceptance testing, training, transition and implementation for each.	26 months	\$77,167,534 Re-baselined to \$108,469,338 (this includes a portion of Release 3's budget)
Iteration 3	Release 3	The business functionality for Medicaid Aged, Blind, and Disabled and the associated change requests necessary for proper program	12 months	\$9,401,329
Iteration 4	LIHEAP	The remaining functionality for Low Income Home Energy Assistance Program (LIHEAP)	15 months	\$5,076,429

Notes: During Iteration 2 LIHEAP was removed from the deployment scope and put on hold to be completed at a later iteration. Also, during iteration 2 Medicaid ABD was put on hold and moved to iteration 3.

PROJECT BASELINES

The baselines below are entered for only those projects or phases that have been planned. At the completion of a project or phase a new planning effort will occur to baseline the next project/phase and any known actual finish dates and costs for completed projects/phases will be recorded. The startup report will be submitted again with the new information.

Project or Phase	Baseline Start Date	Baseline End Date	Baseline Budget	Actual Finish Date	Schedule Variance	Actual Cost	Cost Variance
		(re-baselined)	(re-baselined)				
Release	5/7/2013	4/4/2016	\$45,436,315	3/9/2017	0.0%	\$49,842,738	2.1%
1		(5/8/2016)	(\$50,943,770)				under
Release	2/1/2016	10/17/2017	\$77,167,542	6/30/2019	6.7%	\$102,743,169	5.3%
2		6/30/2018	(\$108,469,338)				under
		5/19/2019					
Release	5/20/19	6/30/2020	\$9,401,330	10/16/2020	1.0%	\$9,115,290.21	3% under
3							

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OBJECTIVES

Project or Phase	Business Objective	Measurement Description	Met/ Not Met	Measurement Outcome
Iteration 1	Objective 1.1: Meet federally mandated requirements to integrate with the federal HBE.	Measurement 1.1.1: Successful send and receipt of all defined eligibility transactions from the federal hub and completion of the enrollment and/or reenrollment processes by October 1, 2013.	Met	
Iteration 1	Objective 1.2: In order to apply the correct Federal Matching Percentage (FMAP) for Medicaid enrollees, the system must be able to determine upon enrollment whether the individual's authorization was based upon existing eligibility criteria or the criteria created by the ACA.	Measurement 1.2.1: Determine methodology the state will deploy for determining the application of FMAP by December 31, 2012. Measurement 1.2.2: The system is able to correctly report claims payment data by FMAP upon go live	Met	
Iteration 1	Objective 1.3: Creation of real-time application process.	Measurement 1.3.1: Public facing application in which the client is capable of completing the application for Medicaid and CHIP online upon go live.	Met	
All iterations	Objective 2.1: Meet the system requirements as outlined in the Centers for Medicare and Medicaid (CMS) Enhanced Funding Requirements: Seven Conditions and Standards (MITS-11-01)	All of the following measurements must be included in the APD submission, be addressed in the Gate Review for concept of operations, and be present upon project completion: Measurement 2.1.1: Modularity Standard - This condition requires the use of a modular, flexible approach to systems development, including the use of open interfaces and exposed application programming interfaces (API); the separation of business rules from core programming; and the availability of business rules in both human and machine-readable formats. Including:	Met	

	 Use of Systems Development Lifecycle methodologies. 	
	States should use a system	
	development lifecycle (SDLC)	
	methodology for improved	
	efficiency and quality of	
	products and services.	
	Identification and	
	description of open	
	interfaces: States should	
	emphasize the flexibility of	
	open interfaces and exposed	
	APIs as components for the	
	service layer.	
	 Use of business rules 	
	engines. States should	
	ensure the use of business	
	rules engines to separate	
	business rules from core	
	programming, and should	
	provide information about	
	the change control process	
	that will manage	
	development and	
	implementation of business rules.	
	Submission of business rules	
	to a HHS-designated	
	repository. States should be	
	prepared to submit all their	
	business rules in human-	
	readable form to an HHS	
	repository, which will be	
	made available to other	
	states and to the public.	
	Measurement 2.1.2: MITA Condition -	
	This condition requires states to align	
	to and advance increasingly in MITA	
	maturity for business, architecture,	
	and data. Including:	
	 MITA Self Assessments. CMS 	
	expects all states to	
	complete a self-assessment	
	and may wait until version	
	3.0 is published (expected in	
	2011).	
	MITA Roadmaps. States will	
	provide to CMS a MITA	
	Maturity Model Roadmap	
	that addresses goals and	

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	objectives, as well as key activities and milestones, covering a 5-year outlook for their proposed MMIS solution, as part of the APD process.	
	 Concept of Operations (COO) and Business Process Models (BPM). States should develop a concept of operations and business work flows for the different business functions of the state to advance the alignment of the state's capability maturity with the MITA Maturity Model (MMM). 	
	Measurement 2.1.3: Industry Standard condition - States must ensure alignment with, and incorporation of, industry standards: the Health Insurance Portability and Accountability Act of 1996 (HIPAA) security, privacy and transaction standards; accessibility standards established under section 508 of the Rehabilitation Act, or standards that provide greater accessibility for individuals with disabilities, and compliance with federal civil rights laws; standards adopted by the Secretary under section 1104 of the Affordable Care Act; and standards and protocols adopted by the Secretary under section 1561 of the Affordable Care Act. Including: Identification of industry standards. CMS will communicate applicable standards to states. Standards would be updated periodically to ensure conformance with changes in	
	 the industry. Incorporation of industry standards in requirements, development, and testing phases. States must implement practices and procedures for the system 	

requirements analysis, system testing, and user acceptance testing (UAT). Measurement 2.1.4: Leverage Condition - State solutions should promote sharing, leverage, and reuse of Medicaid technologies and systems within and among states. Including: Multi-state efforts. States should identify any components and solutions that are being developed with the participation of or contribution by other states. Availability for reuse. States should identify any components and solutions that have high applicability for other reuse by other states, how other states will participate in advising and reviewing these artifacts, and the development and testing path for these solutions and components will promote reuse. Identification of open source, cloud-based and commercial products. States should pursue a service-based and cloud-first strategy for system
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strategy for system
development.
Customization. States will identify the degree and
identify the degree and amount of customization
needed for any transfer
solutions, and how such
customization will be
minimized.
■ Transition and retirement
plans. States should identify
existing duplicative system
services within the state and
seek to eliminate duplicative system services if the work is
cost effective such as lower
total cost of ownership over
the long term.

Measurement 2.1.5: Business Results	
Condition - Systems should support	
accurate and timely processing of	
claims (including claims of eligibility),	
adjudications, and effective	
communications with providers,	
beneficiaries, and the public.	
Including:	
 Degree of automation. The 	
state should be highly	
automated in systematic	
processing of claims	
(including claims of	
eligibility) and steps to	
accept, process, and	
maintain all adjudicated	
claims/transactions.	
Customer service. States	
should document how they	
will produce a 21st-century	
customer and partner	
experience for all individuals	
(applicants, beneficiaries,	
plans, and providers).	
 Performance standards and 	
testing. CMS intends to	
provide additional guidance	
concerning performance	
standards—both functional	
and non-functional, and with	
respect to service level	
agreements (SLA) and key	
performance indicators (KPI).	
Measurement 2.1.6: Reporting	
Condition - Solutions should produce	
transaction data, reports, and	
performance information that would	
contribute to program evaluation,	
continuous improvement in business	
operations, and transparency and	
accountability.	
Measurement 2.1.7: Interoperability	
Condition - Systems must ensure	
seamless coordination and	
integration with the Exchange	
(whether run by the state or federal	
government), and allow	
interoperability with health	
information exchanges, public health	
agencies, human services programs,	
agencies, numan services programs,	

		and community organizations		
		providing outreach and enrollment		
		assistance services. Including:		
		 Interactions with the 		
		Exchange. States should		
		ensure that open interfaces		
		are established and		
		maintained with any federal		
		data services hub and that		
		requests to the hub are		
		prepared and available for		
		submission immediately after successful completion		
		of the application for		
		eligibility.		
		Interactions with other		
		entities. States should		
		consult with and discuss how		
		the proposed systems		
		development path will		
		support interoperability with		
		health information		
		exchanges, public health		
		agencies, and human		
		services programs to		
		promote effective customer		
		service and better clinical		
		management and health		
		services to beneficiaries.		
		Measurement 2.1.8: A state self-		
		assessment will be completed after		
		the release of the final MITA 3.0		
		guidelines.		
All	Objective 3.1: Increase	Measurement 3.1.1: Reduction in the	3.1.1 -	3.1.1 -due to the data
iterations	efficiency in application	meantime from which an application	not met	conversion process, this
recrutions	processing for each	is received until the application is	3.2.1 -	was not met and will not
	program.	authorized. The mean time and	Met	be known for at least one
	FD. 41111	expected reduction for each program		year after the final
		will be identified during the project		Release.
		and met within six months of go live		
		for that program.		
		Measurement 3.1.2: Utilization of		
		online reauthorization at go-live.		
All	Objective 3.2: The system	Measurement 3.2.1: Conduct survey		
iterations	is user friendly.	of Eligibility workers within three		
10010113	is aser inclinary.	months of application roll-out with a		
		90% approval rating.		
		Measurement 3.2.1: Request online		
		customer feedback at end of		
		application process with a 90%		
	<u>L</u>	application process with a 30/0		

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		approval rating for six months post implementation.		
All iterations	Objective 3.3: Web based application is accessible from any location using multiple devices types including PCs, smartphones, and tablets.	Measurement 3.3.1: Successful application access and interaction through identified devices during acceptance testing.	Met	
All iterations	Objective 3.4: Application will include business intelligence features which allows for tracking in real-time key performance measures as well as long term trending via data warehouse solution.	Measurement 3.4.1: Key performance measures are captured during requirements gathering and demonstration of functionality confirmed during user acceptance testing. Measurement 3.4.2: Project will include data extraction, transfer, and load to external data store with business intelligence functionality which will allow stakeholders to query and generate ad hoc reports.	3.4.2 - Met	

POST-IMPLEMENTATION REPORT

Post-Implementation Reports are to be performed after each project or phase is completed. A "PIR" is a process that utilizes surveys and meetings to determine what happened in the project/phase and identify actions for improvement going forward. Typical PIR findings include, "What did we do well?" "What did we learn?" "What should we do differently next time?"

Project or Phase	Lesson learned, success story, idea for next time, etc.

COST BENEFIT ANALYSIS

- The following will be used as budgeting guidelines during the planning phase of the project:
- The 62nd Legislative Assembly passed House Bill 1475 appropriating \$42,617,925 to rewrite the DHS Eligibility Determination systems. Based on initial estimates, this amount includes all costs and risk.

KEY CONSTRAINTS AND/OR RISKS

Constraints:

The project has the following constraints:

- Availability of CMS federal funding for eligibility requirements related to ACA will end December 31, 2015.
- Availability of technical standards for ACA requirements, such as specifications for interfacing with the federal data hub and the federal exchange.
- Cost, schedule, scope, and quality are often in conflict during projects. The governing committee elected to prioritize as follows:

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- 1. Schedule
- 2. Quality
- 3. Cost
- 4. Scope

Risks of Performing the Project:

Risk: Limited resources to complete the project.

Impact: Staff from both DHS and ITD may need to have work reassigned. ITD will need to augment staff by hiring contractors.

Risk: Regulation that has largest impact on eligibility system integration with the health benefit exchange was released as a Notice of Proposed Rule Making (NOPR) on August 12, 2011. It is unknown when the final rules will be released.

Impact: This uncertainty hinders our ability to fully understand the intent of the proposed regulations.

Risk: The design of the new system is based on the external exchange mechanism that determines eligibility base on the Medicaid Modified Adjusted Gross Income. If the federal initiative to build health care exchanges is redacted, the new Eligibility system will need to incorporate this functionality.

Impact: Dependencies will exist regarding sharing information to and from external systems. The degree that the project team can control the interfaces to these systems is a risk to the project.

Risks of Not Performing the Project:

Risk: DHS would need to incorporate new eligibility rules for Medicaid under ACA into the Legacy eligibility systems. Current systems do not have the capability of a real-time application process.

Impact: Inefficient usage of state resources would be expended on new functionality using an outdated technology platform.

Impact: Lose ability to take advantage of federal 90/10 funding match.

Risk: Legacy Medicaid and CHIP eligibility systems would have limited ability to interact with the federally facilitated exchange due to its outdated technology platform.

Impact: The public would not have access to apply for assistance electronically. The state has the potential to be out of compliance.

Risk: Inefficient county worker operations for eligibility determination.

Impact: Would require the continued use of multiple eligibility determination systems.

Impact: Existing processes and maintenance activities remain antiquated.