

# Project Startup Report

## Presented to the IT Committee December 10, 2013

**Project Name:** Eligibility System Modernization

**Agency:** Department of Human Services

**Business Unit/Program Area:** Medicaid, Children's Health Insurance Program (CHIP), and Economic Assistance Programs

**Project Sponsor:** Carol Cartledge, Heather Steffl, Jenny Witham

**Project Manager:** Val Brostrom

### Project Description

The Department of Human Services currently determines eligibility for medical assistance, children's health insurance program, 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 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 our current eligibility systems with a single system that will meet the requirements of the ACA as well as streamline the application process for our 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 medical assistance and 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.

### Key Metrics

Project Start Date	Project End Date	Original Baseline Budget
05/07/2013	06/30/2017	\$59,290,077

### Objectives

Project Objectives	Measurement Description
<u>Objective 1.1:</u> Meet federally mandated requirements to integrate with the federal HBE.	<u>Measurement 1.1.1:</u> 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.
<u>Objective 1.2:</u> 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.	<u>Measurement 1.2.1:</u> Determine methodology the state will deploy for determining the application of FMAP by December 31, 2012. <u>Measurement 1.2.2:</u> The system is able to correctly report claims payment data by FMAP upon go live
<u>Objective 1.3:</u> Creation of real-time application process.	<u>Measurement 1.3.2:</u> Public facing application in which the client is capable of completing the application for Medicaid and CHIP online upon go live.
<u>Objective 2.1:</u> Meet the system requirements	All of the following measurements must be included in the

# Project Startup Report

## Presented to the IT Committee December 10, 2013

as outlined in the Centers for Medicare and Medicaid (CMS) *Enhanced Funding Requirements: Seven Conditions and Standards (MITS-11-01)*

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:

- 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 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

# Project Startup Report

## Presented to the IT Committee December 10, 2013

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 development phases such as 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 development.
- Customization. States will 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).

# Project Startup Report

## Presented to the IT Committee December 10, 2013

	<p><u>Measurement 2.1.6:</u> 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.</p> <p><u>Measurement 2.1.7:</u> 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, and community organizations providing outreach and enrollment assistance services. Including:</p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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.</li> </ul> <p><u>Measurement 2.1.8:</u> A state self-assessment will be completed after the release of the final MITA 3.0 guidelines.</p>
<p><u>Objective 3.1:</u> Increase efficiency in application processing for each program.</p>	<p><u>Measurement 3.1.1:</u> Reduction in the meantime from which an application is received until the application is authorized. The mean time and expected reduction for each program will be identified during the project and met within six months of go live for that program.</p> <p><u>Measurement 3.1.2:</u> Utilization of online reauthorization at go-live.</p>
<p><u>Objective 3.2:</u> The system is user friendly.</p>	<p><u>Measurement 3.2.1:</u> Conduct survey of Eligibility workers within three months of application roll-out with a 90% approval rating.</p> <p><u>Measurement 3.2.1:</u> Request online customer feedback at end of application process with a 90% approval rating for six months post implementation.</p>
<p><u>Objective 3.3:</u> Web based application is accessible from any location using multiple devices types including PCs, smartphones, and tablets.</p>	<p><u>Measurement 3.3.1:</u> Successful application access and interaction through identified devices during acceptance testing.</p>
<p><u>Objective 3.4:</u> 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.</p>	<p><u>Measurement 3.4.1:</u> Key performance measures are captured during requirements gathering and demonstration of functionality confirmed during user acceptance testing.</p> <p><u>Measurement 3.4.2:</u> 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.</p>

# Project Startup Report

## Presented to the IT Committee December 10, 2013

### Cost/Benefit Analysis

The 62<sup>nd</sup> 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 or Risks

#### Constraints:

The project has the following constraints:

- Availability of CMS federal funding at a 90/10 federal match 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:
  1. Schedule
  2. Quality
  3. Cost
  4. Scope

#### Risks of Performing the Project:

Risk: Limited resources to complete the project.

Impact: Staff from both ITD and DHS 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 (NPR) 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: Depending where we are in the life of the project, there could be an impact to the cost and schedule due to rework of completed deliverables.

#### 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 Federal Health Benefit 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.