AHCA Florida Health Care Connections (FX)

P-4: Medicaid Enterprise Certification Management Plan

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Revision History

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Modifications to the approved baseline version (100) of this artifact must be made in accordance with the Artifacts Management Standards.

Quality Review History

DATE	REVIEWER	COMMENTS
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SECTION 1 INTRODUCTION

1.1 BACKGROUND

The Florida Agency for Health Care Administration (AHCA or Agency) is adapting to the changing landscape of health care administration and increased use of the Centers for Medicare and Medicaid Services (CMS) Medicaid Information Technology Architecture (MITA) to improve the administration and operation of the Florida Medicaid Enterprise. The current Florida Medicaid Enterprise includes services, business processes, data management and processes, technical processes within the Agency, and interconnections and touchpoints with systems that reside outside the Agency necessary for administration of the Florida Medicaid program. The current Florida Medicaid Enterprise System (MES) includes the Florida Medicaid Management Information System (FMMIS), Decision Support System (DSS), and other systems operated by different vendors. These systems in the MES, interface primarily through the exchange of data files, via Secured File Transfer Protocol. These point-to-point interfaces become more complex and costlier as the number of systems and applications increase. The future of the Florida Medicaid Enterprise integration is to allow Florida Medicaid to secure services that can interoperate and communicate without relying on a common platform or technology.

During the strategic visioning session held on December 13, 2017, the executive team determined that this project should be focused much more broadly than just a FMMIS replacement, indicating that the project should “Transform the Medicaid Enterprise to provide the greatest quality, the best experience, and the highest value in healthcare.”

To articulate this far-reaching scope, the MES Procurement Project was re-named Florida Health Care Connections (FX) in the summer of 2018.

The Agency contracted with the Strategic Enterprise Advisory Services (SEAS) Vendor, in September 2017 to develop the technology standards and propose solutions for FX in accordance with the CMS Conditions and Standards, including MITA 3.0, and to provide strategic, programmatic, and technical advisory services for the Agency. The 17 initial deliverables were accepted by the Agency in FY 2017-18. The SEAS Vendor is now executing to those deliverables and performing the annual refresh as required by the SEAS Contract, MED191.

CMS released the Medicaid Program Final Rule: Mechanized Claims Processing and Information Retrieval Systems in December 2015. This final rule modifies regulations pertaining to 42 Code of Federal Regulations (CFR) 433 and 45 CFR 95.6111, effective January 1, 2016. Among other changes, this final rule supports increased use of the MITA Framework. MITA is a CMS initiative that fosters an integrated business and information technology (IT) transformation across the Medicaid enterprise to improve the administration and operation of the Medicaid program. The Agency documents its high-level plans to increase service interoperability and advance the maturity of the MES in accordance with the MITA Framework in the FX Procurement Strategy document.

The Medicaid Management Information System (MMIS) Certification process has been in place since 1975 and has been expanded over the years to include formal checklists and three distinct federal checkpoint reviews during the planning, implementation, and post-operation stages. The most recent changes from 2016, 2017, and 2018, in addition to expanding checklists and the review process, added a requirement for states to meet regularly with CMS and to perform Independent Verification and Validation (IV&V) throughout the development and implementation of a new system or new component. This formal process is detailed in a Medicaid Enterprise Certification Toolkit (MECT).

In the fall of 2019, CMS began to transition its systems certification process to one that evaluates how well Medicaid information technology systems support desired business outcomes while reducing the burden on states. This streamlined, outcomes-based approach, or "Outcomes-Based Certification (OBC)," is designed to ensure that systems that receive federal financial participation are meeting the business needs of the State and of CMS.

1.2 PURPOSE

The purpose of the Medicaid Enterprise Certification (MEC) Management Plan is to provide an overall plan to manage the Certification milestone reviews throughout the Medicaid Enterprise Certification Life Cycle (MECL) for each applicable FX module along with recommendations to consider as the Agency moves forward with the modular approach to replacing the current MMIS. The Plan will outline the steps for AHCA to conduct and comply with the MMIS Certification process, including gathering documentation and managing milestone reviews.

1.3 SCOPE STATEMENT

The MMIS Certification process is the prescribed validation process from CMS for states to request and obtain enhanced Federal Financial Participation (FFP) to develop, implement, operate, and maintain their MMIS.

The MEC Management Plan outlines the steps to take for the Agency to comply with the federal Certification requirements as it undertakes the replacement of its current MMIS and expands its IT capabilities to include an Enterprise-wide approach to meet the needs of the Medicaid program and the various stakeholders that interact with Medicaid.

The MEC Management Plan contains the following sections:

Section 2 – Regulations and Guidance – Provides an overview of the federal MMIS Certification requirements, including: a brief history of the MMIS Certification process; the importance of Certification in obtaining and maintaining enhanced FFP for managing the Medicaid program; and descriptions of the guidance documents provided by CMS.

Section 3 – Florida FX Certification Governance Roles and Responsibilities – Lists the stakeholders and their responsibilities during the Certification process and includes a process to inform and train impacted staff. Stakeholders include CMS; Florida Legislature and AHCA Steering/Governance; Department of Management Services' (DMS) Division of State

Technology (DST); AHCA FX Team; IV&V Vendor; SEAS Vendor; Integration Services and Integration Platform (IS/IP) Vendor; and FX vendors.

Section 4 – Florida Medicaid Enterprise Certification Lifecycle (MECL) – Explains the MECL timeline with the three milestone reviews and shows how they fit within the four phases of AHCA's FX procurement timeline. This section also explains the process to complete the 27 defined steps that end with the Final Certification Review.

Section 5 - Medicaid Enterprise Certification Toolkit (MECT) Checklists – Describes the multiple checklist options that will drive the Certification activities, the purposes of the various checklists, and the process of who completes and validates the checklist information.

Section 6 – Required Project Artifacts and Reporting – Describes the tracking and reporting activities to manage the Certification activities.

Section 7 – Updates and Impact Analysis – Provides a brief description of monitoring the changes to federal publications and updating the process documents to be compliant with new regulations.

1.4 GOALS AND OBJECTIVES

AHCA's MMIS Certification expectations for all stakeholders with the FX Project are outlined in the MEC Management Plan. AHCA's top goals and objectives of MMIS Certification for the FX Project include:

Goal #1 – To comply with federal requirements for seeking and receiving approval from CMS for the release of 90/10 FFP to aid Florida in the cost of Design, Development, and Implementation (DDI) for each FX Module or function that is developed to replace the current MMIS solution.

Goal #2 – To comply with federal requirements for seeking 75/25 FFP to aid Florida in the cost of Operations and Maintenance (O&M) for each FX module or function that replaces the current MMIS solution and is operationalized.

Goal #3 – To receive full MMIS Certification authorization from CMS back to day one of operations for each FX module that has been implemented and operating for at least six months.

Goal #4 – To ensure that the State of Florida's current 75/25 FFP rate for O&M is safeguarded from additional unplanned costs associated with the failure to achieve MMIS Certification back to day one of operations for any FX module or functionality that is operationalized.

1.5 REFERENCED DOCUMENTS

On August 1, 2018, CMS updated the MEC Toolkit (MECT) and released Version 2.3. The MEC Management Plan will be reviewed whenever a new version of the MECT is released.

Gaps between the previous version and the current version of the MEC Management Plan will be identified and updated accordingly to ensure AHCA and its vendors are adhering to the most current Certification requirements. Any references to the MECT in this plan refer to current or subsequent releases of the MECT.

In addition to the MECT, Version 2.3, additional documents were also leveraged to support the development of this deliverable and the related MES Certification activities:

- Florida FX Procurement Strategy
- Florida MES Phase 2 Planning Advanced Planning Document (PAPD)
- Florida Implementation Advance Planning Document Update (IAPDU) MES Strategy and Strategic Enterprise Advisory Service (SEAS) Procurement
- Request for Information (RFI) SEAS
- IAPDU Florida MES Independent Validation and Verification (IV&V)
- CMS IAPDU Approval Letter MES IV&V
- Request for Proposal (RFP) MES IV&V
- Planning Advanced Planning Document Update (PAPDU) – FX 003
- CMS PAPDU – FX 003 Approval Letter
- State Medicaid Manual (SMM)
- State Medicaid Director Letters (SMDL)
- MECT 2.3 and any future versions
- Navigating the Transition to MECT 2.x Medicaid Enterprise Systems Conference (MESC) 2017 Slide Deck
- CMS Website: Outcome-Based Certification
- CMS Informational Bulletin: Outcome-Based Certification for Electronic Visit Verification (EVV) Systems, October 24, 2019
- S-3: Strategic Plan Refresh

SECTION 2 REGULATIONS AND GUIDANCE

This section provides a summary of relevant federal MMIS Certification regulations and guidance including the history and importance of MMIS Certification. It explains how the State Medicaid Manual (SMM) provides guidance to the states regarding MMIS Certification.

2.1 CERTIFICATION

Certification is a federal validation process that has been in place since 1975 where CMS reviews a state's new MMIS solution prior to granting 75/25 FFP for O&M of the system after implementation. The last time Florida went through MMIS Certification was in 2010 when it certified the FMMIS, currently operated by DXC Technology, under the MMIS Certification standards in place prior to the implementation of the current toolkit.

Objectives of the Certification validation process for Florida will include:

- Verifying that each MMIS module procured is designed and implemented effectively and efficiently supporting management of the Florida Medicaid Program
- Confirming that specific laws, regulations, and directives are met in the solution
- Ensuring that the new MMIS module is operating as described in the Advance Planning Documents (APDs), Procurement Document Requirements, and Module Solution Vendor's statement of work, and other related contracts

2.2 HISTORY OF MMIS CERTIFICATION

Public Law 92-603 was enacted in October 1972. Section § 235 provided for 90% FFP for DDI, and 75% FFP for O&M of state mechanized claims processing and information retrieval systems approved by the Secretary. **Exhibit 2-1: History of MMIS Certification** shows the progression of changes and updates since 1972.

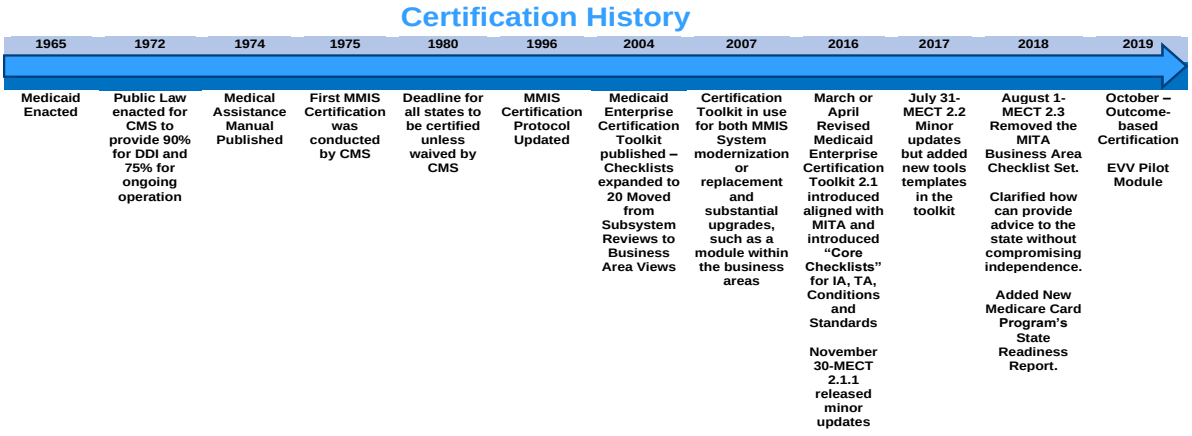


Exhibit 2-1: History of MMIS Certification

CMS defines the mechanized claims processing and information retrieval system which states are required to have, as the MMIS.

CMS defines the MMIS as an integrated group of procedures and computer processing operations (sub-systems) developed at the general design level to meet principal Title XIX Program objectives, including:

- Managing and controlling administrative costs
- Providing service to members and providers, including inquiries
- Managing claims control operations and computer capabilities
- Generating management reporting for planning and control

States are required to have a MMIS according to Section 1903(a)(3) of the Social Security Act and defined in regulation 42 CFR 433.111.

All states operate a MMIS to support Medicaid business functions and maintain information in such areas as provider enrollment; client eligibility, including third party liability; benefit package maintenance; managed care enrollment; claims processing; and prior authorization.

2.3 IMPORTANCE OF CERTIFICATION

One of the most important tasks for the FX Project Team will be to ensure the new FX modules all are certified back to day one of operation. The ramifications of not passing MMIS Certification include:

- Not receiving enhanced federal matching funds to offset the cost for O&M of the solution
- Significant impact to the State of Florida budget, as this funding is typically planned for in the State Medicaid budget with Medicaid funding being one of the largest items in the State budget

2.4 MEDICAID ENTERPRISE CERTIFICATION TOOLKIT (MECT)

To help states become successful at passing this validation process, CMS developed the MECT with guidance and tools to help manage and plan for the process. Since 2007, CMS has released many updates to the MECT. The most current MECT, Version 2.3, was released August 1, 2018. As noted on the CMS website the toolkit has been updated to accommodate modular and agile development, refined Certification criteria, establish a new approach to CMS-state partnership, update criteria to reflect the latest regulations and guidance, and provide templates and tools to assist states and their contractors in the Certification process. From time to time CMS releases updates to the toolkit. Florida will utilize the most current version of the MECT to prepare for the Certification of each FX module implemented as a part of the FX Project. All activities documented in the MEC Management Plan are in alignment with the most current version of the toolkit and this plan will be reviewed and updated to align with

subsequent toolkit updates. The MECT can be accessed on the CMS website located at the following URL:

https://www.medicaid.gov/medicaid/data-and-systems/mect/index.html

2.4.1 MEDICAID ENTERPRISE CERTIFICATION TOOLKIT (MECT)

The MECL is a revised approach to the original MMIS Certification process that states are required to undergo to achieve Certification. The MECL contains four lifecycle phases and three different milestone reviews. Benefits of this new process allows states to receive early feedback about issues that may impede Certification. The MECL process is illustrated in **Exhibit 2-2: Medicaid Enterprise Certification Lifecycle (MECL)**.

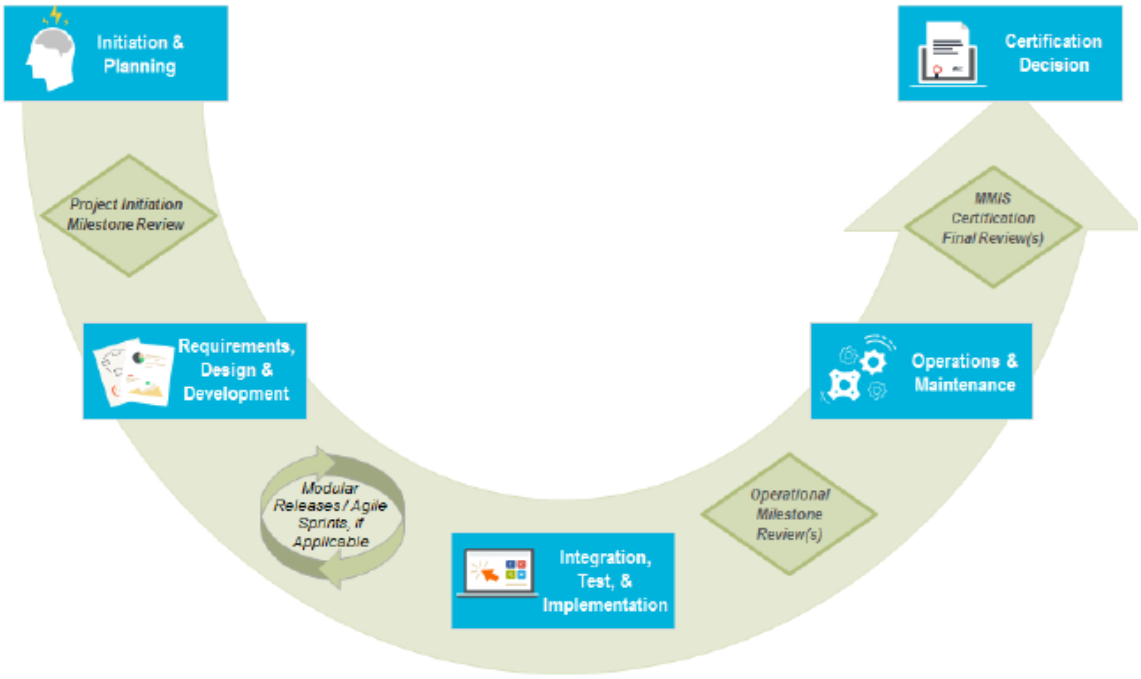


Exhibit 2-2: Medicaid Enterprise Certification Lifecycle (MECL)

2.4.2 OUTCOME-BASED CERTIFICATION

CMS has begun to transition its systems certification process to one that evaluates how well Medicaid information technology systems support desired business outcomes while reducing the burden on states. This streamlined, outcomes-based approach, or "Outcomes-Based Certification (OBC)," is designed to ensure that systems that receive federal financial participation are meeting the business needs of the state and of CMS.

CMS is piloting OBC through a combination of developing outcomes statements and evaluation criteria, identifying test cases for system demonstrations, and collecting and assessing

operational data. CMS will engage states in OBC through pilots and release guidance as new OBC processes are refined.

Electronic Visit Verification is the first system to which CMS is applying an outcomes-based approach to certification. Updates to the P-4: Medicaid Enterprise Certification Management Plan will be made as CMS expands the pilot to future modules.

2.5 STATE MEDICAID MANUAL (SMM)

CMS created and published the State Medicaid Manual (SMM) to help states implement the requirements in Title XIX, including requirements of the MMIS and other aspects of the Medicaid Program. It is both a tool for states and an official notification medium for CMS as noted below.

- As a tool, the SMM references informational and procedural material that is used by the states to help administer their Medicaid programs
- As an Official Notification Medium, CMS uses the SMM to issue mandatory, advisory, and optional Medicaid related policies and procedures to the State Medicaid Agencies (SMAs)

The remainder of this section provides additional requirements in the SMM for MMIS contracts.

2.5.1 CHAPTER 2- STATE ORGANIZATION AND GENERAL ADMINISTRATION

Chapter 2 of the SMM outlines requirements that states must comply with to manage Title XIX. This chapter defines the state organization and summarizes its responsibilities and general requirements for the administration of the program. There are specific requirements that state organizations must adhere to that are outlined in this chapter such as guidelines for contracting and subcontracting, stipulations for obtaining different types of FFP that are available to states, federal reporting requirements, program and policy related information including how to request and maintain waivers, responsibilities for collecting overpayments and conducting fair hearings and appeals to name a few.

2.5.2 CHAPTER 11- MEDICAID MANAGEMENT INFORMATION SYSTEM (MMIS)

Chapter 11 of the SMM defines the MMIS and outlines system requirements that must be met to obtain FFP for the DDI of an MMIS. This chapter provides states with guidance on how and when to complete the Advance Planning Documents (APDs) that must be submitted and approved by CMS to receive the FFP in addition to describing the system review process that states must undergo to receive enhanced FFP for O&M of the MMIS after it is implemented.

2.6 STATE MEDICAID DIRECTOR LETTER #16-010

SMD Letter#16-10 RE: CMS-2392-F MECHANIZED CLAIMS PROCESSING AND INFORMATION RETRIEVAL SYSTEMS – MODULARITY provides sub-regulatory guidance in

the form of letters to State Medicaid Directors. This was the third letter in the series that addressed modular Certification of Medicaid Management Information Systems (MMIS). Guidance included in this letter includes:

- States are encouraged to use a modular approach for replacing portions of a MMIS and discouraged from replacing an entire MMIS
- Modular Certification will be applied to MMIS systems as new modules are introduced and existing modules are replaced
- The updated MECT supports modular Certification and replaces the prior MMIS Certification toolkit
- Description of the system integrator role focusing on ensuring:
  - integrity and interoperability of the Medicaid IT architecture; and
  - cohesiveness of the various modules included in the Medicaid Enterprise
- Role of the IV&V contractor
- MITA 3.0 compliance

2.7 STATE MEDICAID DIRECTOR LETTER #18-005

- SMD #18-005 RE: CMS-2392-F MECHANIZED CLAIMS PROCESSING AND INFORMATION RETRIEVAL SYSTEMS– REUSE. This letter was to provide sub-regulatory guidance to supplement CMS-2392-F, “Mechanized Claims Processing and Information Retrieval Systems (90/10),” which became effective January 1, 2016. This was the fourth letter in the series that letter reaffirms the requirement for reuse in 42 CFR Part 433, Subpart C - Mechanized Claims Processing and Information Retrieval Systems. Guidance in this letter included Enhanced funding requirements for reuse including:
- Expectations for states receiving FFP to share project artifacts, documents and other related materials along with system components and code to other states for leverage and reuse
- How states can meet requirements for reuse by selecting solutions that maximize reuse opportunities
- Expectations for states to participate in workgroups such as the MMIS Cohort, State Technical Advisory Group (S-TAG) and other workgroups to facilitate knowledge sharing
- CMS is supplying additional assistance or guidance in order ensure states are following reuse requirements through the following:
  - Web Resources and a Repository is being provided so that states can share and reuse
  - State Cohort Meetings are sponsored by CMS to help support reuse

- APDs will be required to include reuse plans and CMS will help states identify opportunities
- Cooperative Purchasing within the state or with other states
- Acquisition Reviews will be reviewed to ensure they are consistent with the APD reuse plans
- MECT and Medicaid Eligibility and Enrollment Toolkit (MEET) Solution Requirements
- Design Guidance that should include how the solution can lend itself to reuse
- Documentation Guidance to support operation of the solution by the state or another contractor

- Design Alternatives
- State Innovations in reuse

2.8 CMS Informational Bulletin: Outcome-Based Certification for Electronic Visit Verification (EVV) Systems

- This informational bulletin describes CMS' plan for a streamlined, outcomes-based approach to certify Electronic Visit Verification (EVV) systems used for all Medicaid personal care services and home health services requiring an in-home visit by a provider. Per section 1903(l) of the Social Security Act (the Act), as added by the 21st Century Cures Act ("Cures Act," Pub. L. No. 114-255), states are eligible to receive enhanced, 90% FFP to design, develop, and implement EVV systems, which then must be certified to continue to receive enhanced funding.
- Outcomes-based certification for EVV systems is structured around the following elements:
  - Outcome statements: These describe the desired results once the system is implemented. CMS-provided outcomes are based on the six elements listed in section 1903(l)(5) of the Act
  - Evaluation criteria and required evidence: These correspond to outcome statements and are used by a state and CMS to evaluate the system's functionality and its compliance with laws, regulations, and industry good practices
  - Key Performance Indicators (KPIs): These metrics support the outcome statements. They are used to track the performance of the system over time
- For EVV certifications, states will use the established outcomes, along with their corresponding evaluation criteria and KPIs. States will not be required to use the current certification process found in the MECT, nor required to complete a Project Partnership Understanding for EVV. Except for the certification request letter, states will not submit the artifacts listed in MECT Appendix B.

- While formal Project Initiation Milestone Reviews will no longer be conducted for EVV, CMS will continue to provide technical assistance to states in the planning phases of their systems development life cycles.

SECTION 3 FLORIDA FX CERTIFICATION GOVERNANCE ROLES AND RESPONSIBILITIES

CMS has an established set of roles and responsibilities for the Certification process. One of the recent and key changes in the MECL involves the role of the IV&V vendor. According to 45 CFR § 95.626 (b) and (c) states are required to have an IV&V vendor who is independent from the state unless the state receives a waiver after submitting an alternative approach. AHCA requested and received a waiver to manage its IV&V vendor until the end of the first term, however, AHCA does not have the authority to preview or change IV&V reports that are submitted to CMS. The IV&V vendor submits reports at the same time to AHCA, CMS, and Florida's Department of Management Services' (DMS) Division of State Technology (DST), who provides project oversight while AHCA manages the IV&V Vendor. The Agency provides the reports quarterly to the Florida Legislature and the Governor's Office of Policy and Budget (OPB).

3.1 FX GOVERNANCE

Exhibit 3-1: FX Certification Governance shows Florida's FX Certification Governance Structure for the Certification Process. The Governance Structure provides executive-level oversight and recommendations for decision making, including those related to certification.

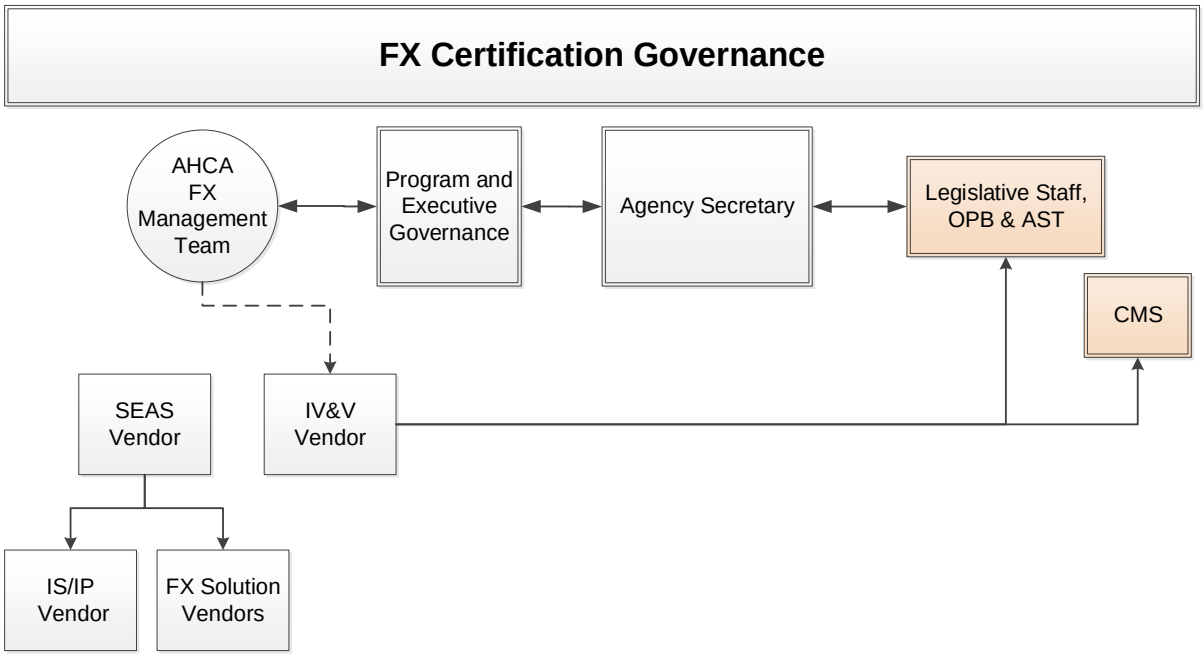


Exhibit 3-1: FX Certification Governance

3.2 ROLES AND RESPONSIBILITIES

The MECL outlines certain roles and responsibilities for CMS, the state, and the IV&V vendor over the course of the lifecycle. In addition, AHCA developed a Standard Operating Procedure for Certification with assigned roles for the Certification process that has been incorporated in the MEC Management Plan. **Exhibit 3-2: Roles and Responsibilities** describes the roles and responsibilities of AHCA, CMS, and its partners for pursuing MMIS Certification for various Florida FX modules.

ROLE	RESPONSIBILITY
CMS Central Office (CMS CO)	▪ Provides overall supervision for MMIS Certification and the MECL ▪ Attends pre-milestone review calls and MMIS Certification milestone reviews ▪ Reviews and comments on all quarterly IV&V MMIS Certification progress reports ▪ Reviews and approves the IAPD ▪ Issues MMIS/ modules final MMIS Certification decision
CMS Certification Review Team	▪ Conducts MECL milestone reviews ▪ Reviews required artifacts and Certification checklists ▪ Attends pre-milestone review calls and MMIS Certification milestone reviews ▪ Makes recommendations to the CMS CO for decision-making
CMS Medicaid Enterprise State Officer Team (CMS SOT)	▪ Coordinates all Certification activities with CMS CO ▪ Serves as a resource for the MECL ▪ Consults with AHCA once the MMIS Concept of Operations (ConOps) is complete ▪ Reviews and recommends IAPD for approval ▪ Reviews the IV&V Vendor's Quarterly MMIS IV&V Progress Reports ▪ Makes suggestions in the CMS tab of the report ▪ Participates in the milestone reviews
Florida State Legislature/Office of Policy and Budget (OPB in the Governor's office)	▪ Provides project oversight and state funding authority
Department of Management Services' (DMS) Division of State Technology (DST)	▪ Provides project oversight including Certification
FX Governance	▪ Provides executive level oversight including those related to Certification
Agency Secretary	▪ Provides executive decision making including those related to Certification

ROLE	RESPONSIBILITY
AHCA	▪ Plans and manages the FX project including Certification ▪ Designates a FX Certification Manager and Coordinator responsible for coordinating with all vendor Certification counterparts on all activities related to Certification plans, processes, and tools; milestone reviews; and enterprise certification management across multiple projects ▪ Designates a Project Lead responsible for coordinating with all vendor Certification counterparts on all project activities related to requirements and certification checklist documentation ▪ Designates a Business Lead and subject matter expert (SME) for each project who is responsible for ensuring the assigned FX Solution Vendor meets project requirements. For Certification the Business Lead and SME are responsible for reviewing the FX Solution Vendor's Certification MECT checklists and artifacts ▪ Tracks and manages to resolution Certification issues identified by the IV&V vendor outside of milestone review reports ▪ Reviews and approves updates suggested by the SEAS vendor for inclusion in the FX Management Plan ▪ Informs and trains AHCA leadership and impacted staff on core MMIS Certification tasks, roles, materials and timeframes ▪ Complete assigned activities outlined in the MEC Management Plan ▪ Procures IV&V services for FX projects ▪ Develops and submits the Project Partnership Understanding (PPU) to CMS ▪ Develops PAPD and IAPD documents and submits to CMS ▪ Plans MMIS Certification milestone reviews in coordination with the CMS Region IV Office ▪ Completes and signs the Certification Request Letter requesting final MMIS Certification from CMS ▪ Approves any ongoing changes to the MEC Management Plan

ROLE	RESPONSIBILITY
IV&V Vendor	▪ Assigns a dedicated Certification resource with strong Certification knowledge that is responsible for coordinating with SEAS and solution vendor Certification counterparts all activities related to Certification including understanding the MEC Management Plan ▪ Represents CMS' interest by providing an independent and unbiased perspective on the progress of MMIS development including the integrity and functionality of the system ▪ Provides AHCA with a perspective and understanding related to the federal requirements Certification, and enhanced federal funding match ▪ Reviews all Milestone Review Artifacts ▪ Evaluates the state's columns and completes the 'reviewer' columns of the checklists ▪ Continuously uses the Certification checklists to review the requirements and design as they are developed ▪ Reviews and prepares the IV&V and Programmatic tabs of the Quarterly MMIS IV&V Progress Reports ▪ Reviews project and technical progress against the state's baseline plans and against requirements in the MMIS Certification checklists ▪ Reports to CMS any risks and gaps, using the Quarterly MMIS IV&V Progress Reports ▪ Completes and delivers draft and final Quarterly MMIS IV&V Progress Reports to CMS, AST, and AHCA simultaneously ▪ Participates in all Milestone Reviews of the MECL ▪ Reviews and contributes recommendations to processes for inclusion in the MEC Management Plan ▪ Completes assigned activities for each assigned process outlined in the MEC Management Plan ▪ Provides input into the MEC Management Plan

ROLE	RESPONSIBILITY
SEAS Vendor	▪ Assigns a Certification Manager responsible for coordinating with the IV&V and solution vendor Certification counterparts on all activities related to Certification including understanding the MEC Management Plan ▪ Assign Certification roles and responsibilities to other resources for each certifiable component as necessary ▪ Develops and documents the MEC Management Plan ▪ Analyzes any subsequent updated documentation for new versions and guidance letters released by CMS related to the MECT ▪ Supports AHCA in managing the MMIS Certification process for each applicable MES project in keeping with the current CMS MECT ▪ Recommends the appropriate Certification checklist for each FX project ▪ Develops the MMIS ConOps ▪ Maintains an updated MITA ConOps and ensure it is ready for the first Milestone Reviews of all applicable FX Solutions ▪ Manages the logistics for all milestone reviews throughout the MECL for each applicable FX project within the required timeframes ▪ Supports the development of PAPD or IAPD and submits to AHCA for review and approval ▪ Reports on the status of MMIS Certification at enterprise governance meetings throughout the MECL for each FX project ▪ Coordinates the Certification process with AHCA's IV&V vendor ensuring the IV&V vendor has full access to project artifacts ▪ Recommends responses to issues identified by AHCA's IV&V vendor in the Quarterly MMIS Certification Progress Reports for each applicable FX project ▪ Implements, maintains, and updates a non-proprietary tracking tool for monitoring the progress of documentation and evidence required for Certification for all FX projects ▪ Maintains the tracking tool on AHCA's FX repository and transfers ownership to AHCA ▪ Adheres to MEC Management Plan ▪ Supports AHCA in developing materials for training on certification for executive management and project teams as requested

ROLE	RESPONSIBILITY
IS/IP Vendor	▪ Provides applicable documentation of requirements as included in the Certification process for each applicable MES project ▪ Provides a Certification Lead responsible for coordinating with the SEAS and IV&V Certification counterparts on all activities related to Certification including understanding the MEC Management Plan ▪ Supports the MECL process for all components which are certified, as described in the current version of the MECT ▪ Works with AHCA's IV&V vendor to ensure IV&V vendor has full access to project artifacts ▪ Participates and provides support as needed to the module vendors for Certification activities including participating in planning activities, meetings, and other activities as required by CMS ▪ Assists the Agency in preparing Certification artifacts, evidence, and presentation materials ▪ Provides all the required remediation activities, based on the Certification findings after each milestone review, on a schedule to be approved by CMS and the Agency ▪ Updates the documentation as necessary to support the Certification process and to reflect changes that have been made to the solution during the Certification process ▪ Adheres to MEC Management Plan

ROLE	RESPONSIBILITY
FX Solution Vendors	▪ Provides applicable documentation of requirements as included in the Certification process for each applicable FX project ▪ Provides a Certification Lead who will coordinate with the AHCA, SEAS, and IV&V Certification counterparts on all activities related to Certification including understanding the MEC Management Plan ▪ Supports the MECL process for all components which are certified, as described in the current version of the MECT ▪ Works with AHCA's IV&V vendor to ensure IV&V vendor has full access to project artifacts ▪ Participates and provides support as needed to the module vendors for module Certification activities including participating in planning activities, meetings and other activities as required by CMS ▪ Completes the State section of the MECT checklist ▪ Produces Certification artifacts, evidence and presentation materials ▪ Provides all the required remediation activities, based on the Certification findings after each milestone review, on a schedule to be approved by CMS and the Agency ▪ Updates the documentation as necessary to support the Certification process and to reflect changes that have been made to the solution during the Certification process ▪ Adheres to MEC Management Plan

Exhibit 3-2: Roles and Responsibilities

3.3 CERTIFICATION LEAD RESOURCES

It is critical that all parties (AHCA, SEAS, IV&V and solution vendors) designate a Certification Lead resource to be responsible for certification activities. The Certification resource is expected to work collaboratively with their counterparts and serve as the point of contact for Certification for their respective organizations. The duties of the various dedicated Certification resources will vary based on the entity for whom they work, however, the Certification Lead resources should have a working knowledge of the following:

- MMIS Certification
- MECL
- MECT 2.3 Required Artifacts
- MECT 2.3 Certification Checklists
- Federal Requirements for Planning Documents
- MITA
- MITA and MMIS ConOps

- Requirements Traceability Matrix (RTM)
- Configuration Design
- Data integration and Interface
- Data Conversion
- Systems Integration Testing (SIT) and User Acceptance Testing (UAT)
- Training and Communication Plans
- Deployment Plan
- Security Plan
- Disaster Recovery Plan
- Business Continuity
- Operations and Maintenance Plan

The Certification Lead resource for solution vendors will be expected to complete the MECT checklists and produce, gather, and deliver evidence documentation in specified formats which the Agency Project Manager and Business Lead will review and approve. The IV&V Certification resource will be responsible for evaluating whether the evidence supplied meets the Certification criteria identified in the Certification checklist that AHCA is seeking to certify.

Select deliverables required by vendors are also artifacts that must be provided in advance to CMS and will be used as evidence for Certification once approved by AHCA. All Certification artifacts are stored in AHCA's FX repository in the Certification Repository to ensure access by all Certification staff and CMS Certification Reviewers when appropriate. See **Exhibit 6-7: Certification Milestone Review Required Artifacts Matrix** of this plan for specific details and minimum requirements for each required artifact.

SECTION 4 FLORIDA FX MEDICAID ENTERPRISE CERTIFICATION LIFECYCLE (MECL)

As noted previously, CMS provides states with a toolkit that includes guidance and information to help states plan and successfully achieve Certification. The updated MECT provides a new phased approach to the MECL whereby MMIS Certification is addressed throughout the system development life cycle (SDLC) as opposed to the previous process that consisted of one final, onsite MMIS Certification review. States typically employ a SDLC that includes several phases:

- Initiation and Planning
- Requirements Definition, Design and Development
- Integration, Testing, Implementation
- Operations and Maintenance

The MECT includes three MMIS Certification reviews called Milestone Reviews that overlay the state's SDLC. The MECL is compatible with either a waterfall or agile approach. The three Milestone reviews outlined in the MECL are:

- R1-Project Initiation Milestone Review
- R2-Operational Milestone Review(s)
- R3-MMIS Certification Final Review(s)

The CMS outcomes-based approach to certification focuses on achieving business outcomes and is intended to reduce the certification burden on states. Compared to the process found in the MECT, certification is streamlined in the following ways:

- Reduced Certification Evaluation Criteria.
- Streamlined Reviews. States undergo an Operational Readiness Review before the system goes live. At least six months later, a Certification Review is conducted. Project Initiation Milestone Reviews are eliminated.
- Introduced Quarterly KPI Reporting. The state reports on KPIs at least once after the Operational Readiness Review and then quarterly after certification. Quarterly reporting is required for as long as a state continues to receive enhanced funding for operations and maintenance.
- Reduced Artifacts List. Except for the certification request letter and system acceptance letter, the state does not need to prepare artifacts listed in MECT Appendix B, nor does it need to prepare a Project Partnership Understanding.

4.1 TIMELINE

AHCA has developed a strategy to increase service interoperability and advance the maturity of the MES in accordance with the CMS conditions and standards and the MITA 3.0 Framework in the ***Florida FX Procurement Strategy***. AHCA has formed a phased approach to replace the current Florida MES. **Exhibit 4-1: FX Procurement Roadmap by Phase** illustrates a timeline for the remaining planned phases of the project as agreed upon by Agency Executives as part of the Medicaid Enterprise Strategic Plan Refresh.

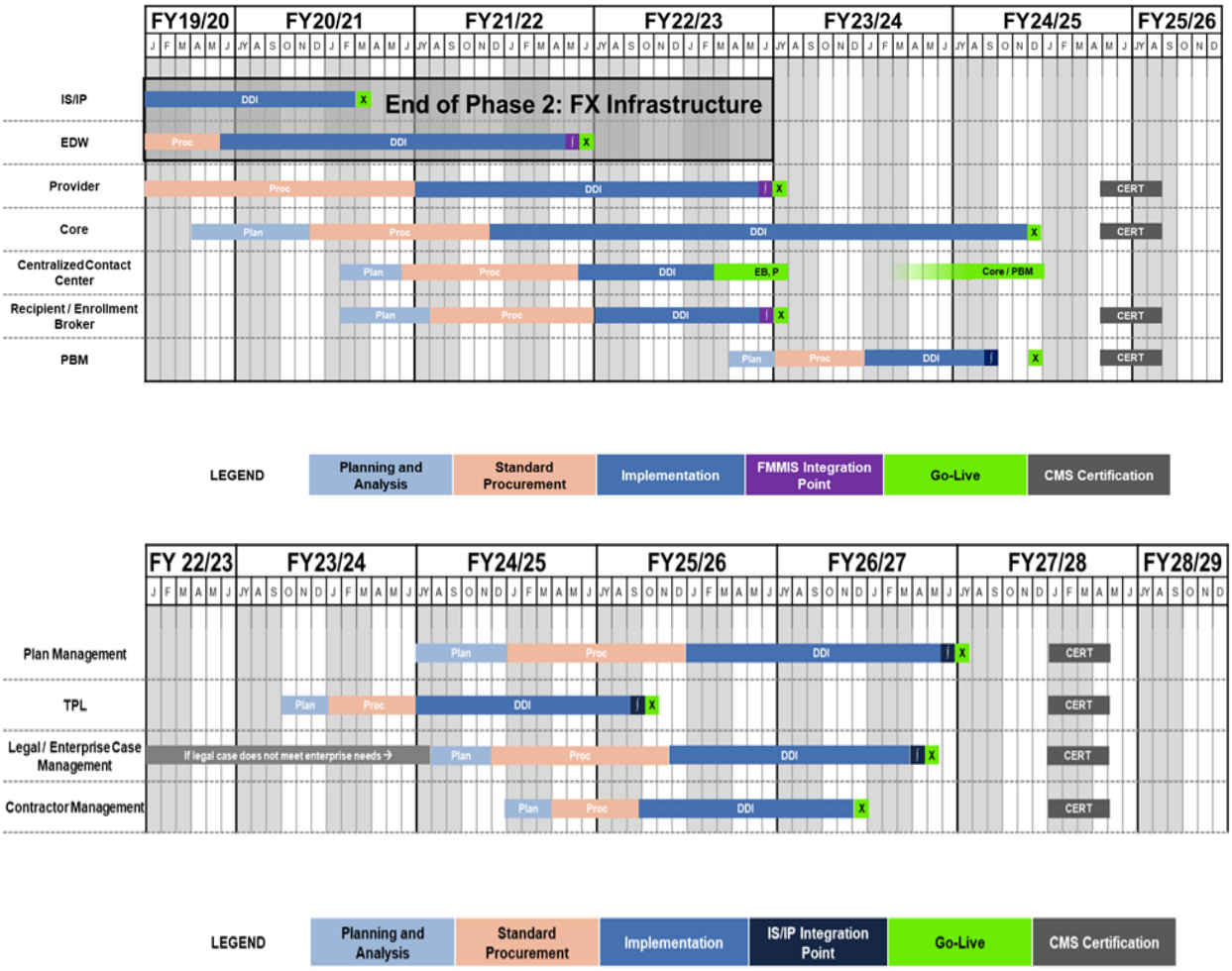


Exhibit 4-1: FX Procurement Roadmap by Phase

As noted in **Exhibit 4-1: FX Procurement Roadmap by Phase** there are four phases in the FX procurement timeline. Below is a description of each phase:

- **Phase 1** – AHCA procures a Strategic Enterprise Advisory Services (SEAS) vendor to operate an enterprise-wide Project Management Office (PMO) while providing programmatic, strategic, and technical advisory services to AHCA regarding system integration
- **Phase 2** – AHCA and the SEAS vendor collaborate to develop an FX infrastructure by procuring vendors to supply Integration Service and Integration Platform (IS/IP) and an Enterprise Data Warehouse (EDW)
- **Phase 3** – This phase includes activities to procure modules to transform and improve the business processes that are currently occurring within the FMMIS, replacing this functionality with solutions that are interoperable with other systems within FX, and potentially within the larger Florida Health and Human Services (HHS) Agency ecosystem
- **Phase 4** – This phase implements the remaining non-FMMIS modules planned in FX that are necessary to accomplish the FX vision of transforming the Medicaid Enterprise to provide the greatest quality, the best experience, and the highest value in healthcare

The FX Procurement Roadmap envisions final module certification activities occurring in two phases as a cohort. Modules that are designed, developed, and deployed around the same time are allowed to go through Milestone Reviews concurrently for all the cohorts.

4.2 COMMUNICATING AND COORDINATING WITH IMPACTED STAFF

It is important that all impacted staff understand the critical role MMIS Certification has in the success of the project. Project team members must fully understand the MECL and the individual roles and responsibilities they have in the process. Targeted communication in addition to training is imperative to successful MMIS Certification.

4.2.1 COMMUNICATION WITH CMS SOT AND THE CMS CERTIFICATION REVIEW TEAM

In order successfully manage the Certification process, it is critical to ensure that the lines of communication are open with CMS. The SEAS Certification Lead will help AHCA track any certification related questions for CMS and provide any open questions to the AHCA Certification Manager. The AHCA Certification Manager requests responses from the CMS SOT who in turn coordinates responses or discussions with the CMS Certification Review Team, if necessary. All Certification questions and responses to and from the CMS SOT are tracked in a question log until the nonproprietary Certification Tracking tool is selected and in place. The responses are shared with the FX project team during the regularly scheduled Certification Status Meeting.

Outside of the regular meetings with CMS during the development of each module, CMS also provides a CMS Certification Email where the AHCA Certification Manager can send questions.

As AHCA nears the execution of each milestone review, communication with the CMS Certification Review Team will increase. All communications with the CMS Certification Team will go through the AHCA Certification Manager to ensure consistent representation from AHCA.

4.2.2 MEETINGS AND WORKGROUPS

QUARTERLY CERTIFICATION STATUS MEETING

AHCA will implement, conduct, and facilitate a Quarterly Certification Stakeholder Meeting that will include all FX Project Managers and leadership from AHCA, IV&V, SEAS, IS/IP and the solution vendors along with their dedicated Certification resources. The Quarterly Certification Meeting's purpose is to provide a high-level status of Certification tasks, including development and collection of artifacts and evidence, discussion of any potential risks or issues associated with Certification, and identification and management of any cross-project impacts. High level status reports generated from the Certification Tracking Tool are also reviewed.

The meeting also serves as an avenue to disperse other critical information across all organizations. The SEAS vendor is responsible for supporting the meeting by providing the project schedule status each month. The SEAS vendor also supports AHCA with preparing the agenda, scheduling the meeting and Teams sessions, securing meeting space, taking minutes and action items each month.

CERTIFICATION WORKGROUP BY FX PROJECT

A Certification Workgroup meeting for each FX project will be conducted on a bi-weekly basis to ensure all parties work together with AHCA to ensure a successful Certification. The Certification Workgroup members will initially only include AHCA, IV&V, SEAS, IS/IP and the solution vendor's designated Certification resources, however, as the Workgroup deems necessary, other critical members may be identified and expected to participate, especially as milestone review planning activities begin for each milestone review. The Certification Workgroup is facilitated by the AHCA Certification Manager. The SEAS vendor is responsible for supporting the Certification Workgroup by preparing the agenda, scheduling the meeting and Teams sessions, securing meeting space, and taking minutes and action items at each Workgroup Meeting.

The Certification Workgroup will be responsible for identifying Certification tasks, completing or coordinating the effort throughout the MECL. Some of the Workgroup responsibilities include reviewing and developing content for Certification training, identifying Certification communication topics, producing Certification content for in inclusion in the FX Portal, making planning decisions, reviewing and approving Certification evidence and other required documentation, preparing for milestone reviews, and executing each milestone review. Members will all be assigned tasks that will be tracked in meeting minutes. Action items not resolved in the workgroup by team members will be escalated as risks and documented using the enterprise risk process. All Workgroup members assigned tasks are expected to complete assigned tasks in a timely manner to ensure that a successful milestone review with CMS. Some tasks the Certification Workgroup members will complete, or ensure resources are assigned to complete include:

- Certification Training
    - Identifying Topics

- Reviewing Training Materials
- Scheduling Training Space
- Supporting Training Sessions
  - Facilitating
  - Presenting
  - Projecting

- Certification Communication
  - Identifying Topics
  - Developing FX Portal Content
  - Reviewing FX Portal Content
- Certification Progress Review
  - Reviewing Certification Assignment Tracker status and updating tasks
  - Coordinating development of certification checklists and artifact documentation
  - Resolving certification evidence or artifact issues
- Milestone Review Planning Activities
  - Developing a style guide and other standards as necessary for all vendors to use and refer to when developing artifacts, presentations, evidence, etc.
  - Developing and finalizing agendas for the reviews
  - Scheduling online meetings/conference calls
  - Securing meeting rooms, equipment and Teams sessions for the reviews
  - Testing access prior to granting access to CMS Reviewers
  - Granting and communicating access to CMS Certification Review Team
  - Assigning roles and responsibilities for the milestone review meetings
  - Developing logistics guide for people traveling to Tallahassee
- Milestone Review Preparation Activities
  - Identifying and developing presentations
  - Scheduling and participating in dry runs and practice reviews
  - Schedule and participating in Milestone Review Certification Practice Sessions
  - Developing Certification articles and content to be included in the FX Newsletter
  - Identifying outreach avenues to communicate with project stakeholders
- Milestone Execution Activities
  - Facilitating communication and meeting access

- Presenting
- Projecting and Virtual Meeting/Sharing Responsibilities
- Note Taking
- CMS Action Item Resolution Status

- Lessons Learned
  - Identifying and evaluating ways to address lessons learned in the current process
  - Recommending implementation of lessons learned for future projects

The MITA Pulse Tracking tool procured by the Agency will facilitate tracking of all Certification activities for each project lifecycle. The MITA Pulse Tracking tool is not intended as the place to store the artifact documents or evidence. Artifact documents, checklists, and checklist evidence are stored on the FX Repository. The MITA Pulse Tracking tool will track assignments for certification events including scheduling/coordinating/preparing for CMS consults (initial, ConOps) and milestone reviews, repository access and training, FX vendor contract submission & approval, and any other activities/tasks.

4.2.3 FX PORTAL

The FX Communications plan includes a FX Portal that will be implemented and published to the FX stakeholders. The FX Portal communicates to stakeholders who are not typically included in the development of the project but are users of the system. Disseminating Certification related information helps reinforce training and ensures staff understand the new process and stays engaged in each milestone review through Final Certification of each FX Module.

The FX Portal will be leveraged and include a Certification section. This is a great avenue to communicate the upcoming Certification Training schedules and share other Certification information such as milestone review schedules, Certification status, Certification contacts for each organization, etc. Though anyone can suggest and provide content, the Certification Workgroup is responsible for brainstorming ideas for articles, developing the Certification related content, and working with the FX Portal editor/coordinator to submit and publish content in the FX Portal. The Certification Workgroup will ensure that communications with stakeholders regarding Certification is frequently provided to stakeholders throughout the life of the project.

4.3 TRAINING IMPACTED STAFF

Since compliance of federally mandated processes and procedures is a critical success factor for the MECL of each FX Module, a solid enterprise-wide Certification training approach will help ensure successful outcomes are achieved. It also helps to ensure all affected stakeholders clearly understand the processes and the roles they play. For this reason, AHCA has developed a curriculum outline that includes identifying and training impacted staff on core MMIS Certification tasks, roles, materials, and timeframes. Once trained, impacted staff will

have the information and guidance they will need to successfully achieve full Certification for each FX module implemented.

The new process engages stakeholders earlier than most stakeholders are accustomed to when compared to the previous MMIS Certification review protocol in place when Florida last went through the Certification process. The SEAS vendor is responsible for supporting AHCA with planning and training tasks. This includes helping identify impacted stakeholders as well as developing the curriculum and training materials in addition to scheduling and delivering Certification training for project stakeholders. The training that will be developed and delivered includes the MMIS Certification tracks outlined below:

- **Informational session** (Agency Leadership) content will include, at a minimum:
  - Federal System Certification authority and purpose
  - MECT overview
  - MECL
  - Roles of the three primary parties: CMS, State (AHCA MES), IV&V vendor
  - Roles of participating parties: SEAS, IS/IP and FX Solution vendors, Project Stakeholders, FX Governance
  - Alignment with MITA SS-A, APDs and funding process, and FX module project management
  - Certification activities tracking and reporting
- **Core Certification** (Project teams - SMEs, IV&V, IS/IP, and Module Vendors) training will include, at a minimum:
  - MMIS Certification authority and purpose
  - MECT overview
  - MECL
  - Roles of the three primary parties: CMS, State, IV&V Vendor
  - Roles of participating parties on State team: FX Management Team, SEAS, IS/IP, State subject matter experts (SMEs), FX module vendors, project stakeholders, FX Governance
  - Alignment with MITA SS-A, MMIS and MITA ConOps documents, FX Strategic Plan, APD funding process, and FX module project management
  - Certification Checklists, Critical Success Factors (CSF), and Artifacts
  - IV&V Progress Reports and Findings
  - Milestone Reviews and Logistics
  - Final system Certification process and activities
  - State activities and completion tracking

Once an FX project is authorized to begin, additional training tailored to the specific schedule and stakeholders of the project may be needed.

The SEAS Certification lead shall coordinate with the AHCA Certification Manager to complete the activities outlined in **Exhibit 4-2: Certification Activity Table**.

ACTIVITY NAME	OUTCOME/ OUTPUT	RESOURCE MATERIALS
Identify impacted staff for certification informational sessions including Agency Management Team (AMT), Governance, DMS, State Agency Partners	Spreadsheet of informational session participants	Governance Plan, FX Strategic Plan, Stakeholder Analysis
Identify impacted staff for core certification training: AHCA FX Management Team, SEAS, IV&V, IS/IP, State SMEs, FX module vendors	Spreadsheet of core training participants	Stakeholder Analysis, SME list
Create the informational session curriculum	Outline and materials (post on FX Projects Repository)	MECT
Create the core training curriculum	Outline and materials (post on FX Projects Repository)	MECT
Schedule training	Training Schedule; venues, and participant notifications	Participant lists, training rooms
Deliver training; obtain participant evaluations	Complete training sessions; evaluation forms	Training outline, materials, participant lists, and schedule
Review participant feedback and revise training courses as needed	Revise training curricula	Participant course evaluations
Schedule additional training as needed or as curricula are updated	Develop training schedule, venues, and participant notifications	Revised curricula, participant lists, training rooms

Exhibit 4-2: Certification Activity Table

4.4 Finalizing the Artifacts and Checklist

4.4.1 Joint Reviews

The SEAS vendor coordinates joint review sessions by checklist with the relevant SMEs as well as leads the dedicated Certification resources from AHCA, IV&V, SEAS, IS/IP and the solution vendors (for R2 and R3 only). Together they review links within the checklists that navigate to the evidence and validate that the Certification criteria evidence adequately demonstrates the criteria being met or partially met. If deficiencies are identified, the SEAS vendor documents the deficiencies and assigns action items to the parties assigned to correct the deficiencies. The SEAS vendor monitors the action items through to resolution.

4.4.2 Quality Checks

The SEAS vendor will conduct quality checks of all the artifacts and Certification checklists after all the joint reviews are completed and before they are submitted to the AHCA Certification Manager for final review prior and upload to the CMS/IV&V repository library. The Quality Check includes verifying:

- Certification checklists are completed, and evidence is stored in the State/Vendor library of the Certification repository
- Evidence is sufficient to support validation of the checklist criteria
- Links are functional within the Certification checklists
- Criteria assessments are complete, and none are left blank, or are missing evidence or an explanation for the lack there of
- Criteria marked as “No” or “N/A,” have an appropriate justification included on the checklist

Results of the quality reviews are shared with AHCA, IV&V, SEAS, IS/IP and the solution vendors for necessary resolution and are entered and tracked in the Certification Tracking Tool. Quality errors are expected to be remediated and addressed in timely manner to ensure timely, accurate delivery of the Checklists and Evidence to the IV&V vendor.

4.4.3 IV&V Delivery and Review

Required artifacts identified in **Exhibit 6-7: Certification Milestone Review Required Artifacts Matrix** identifies owners of each required artifact for each milestone review. Once the quality review, remediation, and quality checks are complete the SEAS vendor ensures all artifacts, checklists, and evidence are finalized and stored in the State/Vendor Library of the repository. The SEAS vendor will validate that all files and folders are numbered, named, and filed correctly before handing it off to the AHCA Certification Manager for final sign-off and delivery to the IV&V vendor for their review/assessment.

4.4.4 IV&V Progress Report and CMS Delivery

After the IV&V vendor finishes conducting their official review and entering comments on the Certification checklists, they prepare their Progress Report and deliver it and the checklists to CMS and AHCA at the same time.

After the final assessed checklists and progress report are delivered from IV&V to CMS and AHCA, and before the CMS review is completed, there is an opportunity to prepare a State Response for any requirements not assessed by IV&V as Meets. This response is the opportunity to supply additional evidence that was not in the checklist, make corrections to the evidence supplied in the checklist, or agree with the IV&V assessment with a plan to adjust before the next milestone.

AHCA will replace the posted checklists with the assessed checklists in the CMS and IV&V Review libraries Checklist folder of the Certification Repository project sub-site. The SEAS vendor logs the IV&V comments and recommendations into the MITA Pulse Tracking tool and helps AHCA coordinate and resolve them immediately with the parties necessary following the submission to CMS. AHCA, SEAS, and the Solution Vendor will review the IV&V assessment to respond, make corrections, or add supporting evidence, when appropriate.

4.5 Milestone Reviews

This section details general information that applies to all milestone reviews described in Sections **4.6.2 The Project Initiation Milestone Review (R1)** (13a), **4.6.5 The Operational Milestone Review(s) (R2),** and **4.6.6 MMIS Certification Final Review(s) (R3)**. For information unique to a specific milestone review, please reference the specific milestone review section for details.

4.5.1 Planning

As noted previously, the Certification Workgroup is responsible for suggesting and making milestone review planning decisions. The Certification Workgroup also meets to plan for the milestone reviews and identifies, assigns, and carries out the necessary planning activities to be completed to assure a successful milestone review.

Some activities that must be completed as a part of the planning effort for all milestone reviews include:

- Determining, with CMS, whether the milestone review will be virtual or onsite
- Scheduling and facilitating planning meetings/conference calls including
  - Scheduling meeting rooms/phone number/Teams
  - Sending meeting invitations
- Documenting meeting notes, actions and decisions

- Tracking action items to closure
- Identifying the CMS Certification Review Team members that need access to the required artifacts, checklists and evidence

4.5.2 PREPARATION

To prepare for all milestone reviews, the SEAS vendor will ensure that all the required artifacts, Certification checklists, and evidence are stored securely in the State and Vendor Work Directory of the Certification Repository. The AHCA Certification Manager will post final checklists, artifacts, and evidence to the CMS/IV&V Library.

All AHCA SMEs participating in the milestone reviews should be familiar with the Certification Repository and content that the CMS Certification Review Team will be reviewing from participating in the joint reviews. SMEs will be expected to continue to be familiar with these documents in preparation for the actual milestone review

Activities completed by the Certification Workgroup as a part of the preparation effort for all milestone reviews include:

- Scheduling meeting rooms for planning, Milestone Review Certification Practice Sessions and milestone reviews
- Sending meeting invitations for Certification Milestone Review Practice Sessions
- Developing and reviewing presentation materials to be used for the milestone reviews
- Planning and conducting Milestone Review Certification Practice Sessions with all AHCA and FX vendor participants
- Coordinating requests and access set up for CMS Certification Reviewers including
    - Providing credentials and instruction to the Certification Repository, CMS and IV&V Library
    - Coordinating access to Certification Repository for CMS Certification Reviewers
    - Resolving any issues with links to the required evidence to support the artifacts and checklists
    - Coordinating collection and delivery of additional last-minute requests for artifacts by CMS
- Coordinating system demos and live online access, as required
- Communicating with CMS SOT, CMS Certification team, and MITRE
- Sending meeting invitations for milestone reviews
- Preparing and distributing agendas based on information received by CMS

AGENDA

AHCA will receive a proposed agenda from the CMS Certification Team prior to each milestone review. AHCA will share the agenda and coordinate with the workgroup members to refine the agenda and assign preliminary presentation responsibilities to AHCA, IV&V, SEAS, IS/IP, and the solution vendor(s).

Once these assignments are made, certification team members are expected to prepare their presentations in accordance with established completion timeframes prior to the Milestone Review Certification Practice Sessions.

ADVANCE REQUESTS AND QUESTIONS FROM CMS CERTIFICATION TEAM

In advance of a milestone review, the CMS Certification Review Team will send questions and requests for additional artifacts which will help to inform the State of the focus of discussions expected during milestone review.

MILESTONE REVIEW CERTIFICATION PRACTICE SESSIONS

Once presentation responsibilities are assigned, the responsible parties are expected to prepare their PowerPoint presentations and provide the completed presentations to the Certification Workgroup for review according to the established deadline, usually two weeks before the scheduled milestone review and feedback. The SEAS vendor will complete quality reviews of the presentations to ensure all materials are consistent and ready for presentation.

Two weeks before the milestone review, the SEAS vendor will schedule Milestone Review Certification Practice Sessions for each presenter to present their material to the full group. This allows time for feedback and necessary modifications to the presentation to be made.

A final Milestone Review Certification Practice Session is scheduled within five days of the actual Milestone Review.

4.5.3 EXECUTION

AHCA will facilitate all Certification Milestone Review Meetings, and the SEAS vendor shall support as outlined below.

- Ensuring phone lines are connected
- Making sure computers are displaying meeting content for participants and virtual attendees
- Providing a scribe to take notes and action items during each checklist review session
- Ensuring links to the Checklists and Evidence are functioning for display and review
- Making sure the appropriate resources are in the room to answer questions

- AHCA, SEAS, IV&V, IS/IP, and the Solution vendors will make relevant staff available to answer all questions from the CMS Certification Review Team

The SEAS vendor shall manage the action item log during each milestone review. Action items will be assigned throughout the process to AHCA and any appropriate vendors. It is critical for any parties who are assigned an action item to resolve it while the CMS Certification Reviewers are still meeting with AHCA.

All action items should, at a minimum, be turned around within 24 hours. If more time is necessary, it must be discussed and approved by the AHCA Certification Manager. Resolution timeframes that exceed five business days from the initial request must be updated weekly. During each milestone review the SEAS vendor shall support AHCA with resolving and delivering any requests from the CMS Certification Review Team by:

- Documenting all action items on the Certification Milestone Review Action Log noted in **Exhibit 4-3: Florida Certification Assignment Tracker Milestone& CMS Coordination**
- Confirming action items captured with CMS before each lunch break and before concluding each day
- Coordinating the delivery of the information from the party responsible for the action item to the CMS Certification Reviewers and all Certification Stakeholders, and agreement is reached with CMS prior to closing the action items
- Ensuring Florida team members are informed by email of assigned action items as soon as the log entry is made,
- Providing CMS Certification Review Team with updates on Action Item status daily until all action items are resolved

Action items that have been resolved are all later logged into the global PMO action item log to capture the history. Any items that are not resolved during the milestone review will also be added and tracked accordingly until they are closed.

Exhibit 4-3: Florida Certification Assignment Tracker Milestone& CMS Coordination is an example of the information that will be captured and managed by the SEAS vendor to accomplish action item tracking and resolution during all milestone reviews.

Project: EDW and IS/IP											
CMS AI #	Date Raised	Agenda Section	Name of CMS Requester	Action Item	Action Item OWNER	DUE DATE	STATUS (Open, In Process, Completed	STATE APPROVER	Date Approved	CMS ACCEPTED (name)	NOTES

Exhibit 4-3: Florida Certification Assignment Tracker Milestone& CMS Coordination

4.6 PROCESS OVERVIEW

The activities in the MECL process are shown in **Exhibit 4-4: Medicaid Enterprise Certification Life Cycle** and explained with reference to the title of each box on the MECL diagram and the associated number, and has been updated with AHCA specific information.

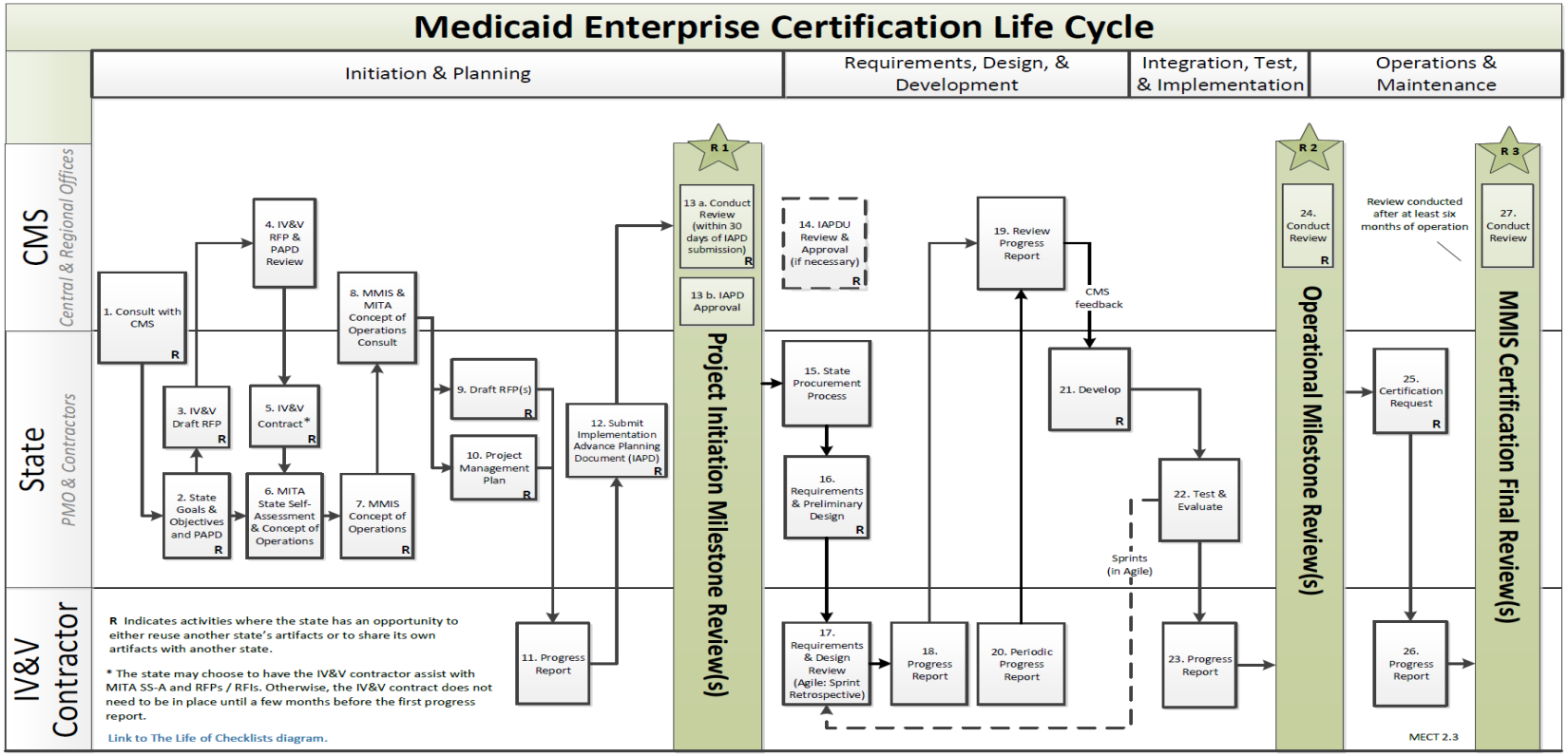


Exhibit 4-4: Medicaid Enterprise Certification Life Cycle

The Phases outlined in this section include:

- Initiation and Planning Phase
  - Project Initiation Milestone Review (R-1)
- Requirements, Design, and Development Phase
- Integration, Test and Implementation Phase
  - Operational Milestone Review (R-2)
- Operations & Maintenance (O&M) Phase
  - Certification Request
  - MMIS Certification Final Review (R-3)

While this section provides high level information regarding the MECL, certain sections may not specifically apply to Florida Medicaid. In steps where Florida Medicaid has received guidance from the CMS SOT, additional Florida specific explanations are provided at the end of the section.

The P-4: Medicaid Enterprise Certification Plan will be updated to reflect the steps and phases of an outcome-based module, if Florida is selected as a pilot state for future modular implementation or if CMS releases guidance on Outcome-Based Certification outcome statements, evaluation criteria, test case identification for system demonstrations, and collection and assessment of operational data.

4.6.1 Initiation and Planning Phase

This initial planning phase includes many activities and a close interaction between AHCA and the CMS SOT to get the project up and running. This phase includes the procurement of an IV&V vendor to provide oversight activities on behalf of CMS. The first milestone review occurs at the end of this phase and within 30 days of the submission of the IAPD requesting funding for the design development and implementation (DDI) of the first certifiable module.

Included below are high level descriptions of activities that occur during this phase. The number in parentheses corresponds directly with the activities outlined in the MECL illustrated in **Exhibit 4-4: Medicaid Enterprise Certification Life Cycle**.

Consult with CMS (1)

As explained in the MECT 2.3, during the initiation and planning stage, the state is expected to do the following:

- Notify CMS SOT of the state's intent to update the MMIS/modules
- Schedule Consult with the CMS SOT to discuss:

- The state's general MMIS transformation approach
- Questions about the MECL
- Agreement between the state and the CMS SOT on a preliminary "critical path" for the state's certification lifecycle, including setting high-level milestone review timeline
- Frequency of MMIS IV&V Progress Reports – required quarterly at a minimum per MECT 2.3
- Final selection of the MMIS Certification checklists that will be used throughout the MMIS Certification lifecycle for planned system changes in concert with input from CMS
- Reuse opportunities

- After the consult with CMS, document decisions in the Project Partnership Understanding (PPU) document
- The PPU will be updated as significant changes occur in the State's certification strategy

STATE GOALS AND OBJECTIVES AND PLANNING DOCUMENT (PAPD) (2)

After meeting with CMS, the state continues through the Planning stage by completing these activities

- Document its goals and objectives for the planned system changes, including re-use possibilities discussed with CMS
- Prepare a PAPD, if the state is requesting federal funding
- Submit the PAPD to the CMS SOT

IV&V DRAFT REQUEST FOR PROPOSAL (3)

While the PAPD is under review, the state continues planning activities by developing a draft IV&V Solicitation document or drafts modifications to an existing contract making sure to include standard IV&V language required by CMS. The standard language ensures the IV&V Vendor:

- Is independent from the state agency that manages the MMIS project
- Does not perform software testing
- Reviews project management and technical design
- Submits periodic Progress Reports

Once completed, this draft IV&V Solicitation is also sent to the CMS SOT for approval.

For Phase 2 of the Florida Medicaid procurement strategy, AHCA completed this activity in 2017. For subsequent modules this step will have to be repeated.

REVIEW OF PAPD AND IV&V RFP (4)

The CMS SOT reviews the draft PAPD and renders a decision to approve or disapprove the request. In addition, the CMS SOT reviews the draft IV&V solicitation ensuring that language is included to require the IV&V vendor to perform technical design reviews, project management reviews, and simultaneous submission of MMIS Certification progress reports to both the state and CMS.

CONTRACT WITH IV&V VENDOR (5)

Once CMS SOT approves the IV&V Vendor contract language, the state goes through their procurement process to contract with an IV&V vendor. The state may choose to add additional responsibilities to the IV&V vendor such as assisting with the MITA SS-A or solicitation development. However, if they choose not to add additional responsibilities, the IV&V vendor contract only needs to start a few months in advance of the first MMIS IV&V Progress Report.

AHCA has awarded a four-year contract to NTT Data (formerly Cognosante Consulting, LLC) to serve as the FX IV&V Vendor. NTT Data is currently engaged in the FX project and has begun performing IV&V activities and is expected to provide oversight of all FX modules throughout the life of the project. MITA and solicitation development activities are provided through the SEAS vendor.

MITA STATE SELF-ASSESSMENT (SS-A) AND CONCEPT OF OPERATIONS (CONOPS) (6)

The state uses the MITA SS-A to document current systems MITA maturity level (As-Is), the desired future maturity (To-Be), and the plan of action to achieve this desired future state. The state is encouraged to consider reusing examples from other states and to share their artifacts with other states. The MITA ConOps is prepared based on this information and describes how the state will progress toward this future state.

Activities completed by the state during this phase include:

- Complete a MITA As-Is and To-Be maturity level for the four areas of the MMIS:
  - Business Architecture
  - Information Architecture
  - Technical Architecture
  - Standards and Conditions for Medicaid IT
- Create technical and data strategies
- Create MITA ConOps
- Document a transition plan or Roadmap for moving from the current maturity level to desired future maturity

CMS provides a recommended eSS-A tool in the MECT toolkit for states to use when submitting the SS-A scorecards to CMS SOT. Florida procured the Source Pulse MITA SSA and Certification product to use and submit to CMS all updated MITA SS-A scorecards.

The SEAS vendor by contract must update the SS-A at a minimum of annually to include work in the Strategic, Programmatic, and Technical domains. As a part of the contract the SEAS vendor is contracted to complete the following key SS-A related deliverables:

- Create a Strategic Plan including the MITA ConOps (SEAS Deliverable S-3)
- Create technical and data strategies (SEAS Deliverables T-4 and T-1)
- Complete the MITA SS-A update and Roadmap (SEAS Deliverables P-1, S-3, T-2, and T-5)
- Develop a Scorecard using the SS-A (SEAS Deliverables P-1)

AHCA expects current versions of these documents be completed prior the CMS SOT Consult in Activity (8) and the final IAPD update.

DEVELOP THE MMIS CONCEPT OF OPERATIONS (CONOPS) AND CMS CONSULT (7)

The state produces a MMIS ConOps document that explains the state's plans for the MMIS technical solutions and how these solutions will integrate internally and with outside state and Federal systems. This document explains how the state plans to apply the conditions of reuse and modularity. AHCA will use the template provided in the MECT to develop and make future modifications to the MMIS ConOps for the MES.

State activities performed during this step include:

- Review the critical success factors
- Review MMIS Certification checklist criteria
- Review MITA Technical and Information Strategies and Roadmap
- Create a MMIS ConOps

AHCA expects the SEAS vendor to produce the MMIS ConOps using applicable content from the draft ITN, IAPD, MITA SS-A, and other project deliverables. SEAS task orders for each FX project will include this task.

CONSULT WITH CMS SOT REGARDING THE MMIS AND MITA CONCEPT OF OPERATIONS (CONOPS) (8)

During this consultation with the CMS SOT, the state discusses the MMIS and MITA Concepts of Operations documents. This meeting provides CMS SOT with an understanding of the state's operating concept that will be included in the upcoming IAPD and provides the state early feedback from CMS regarding their high-level concept for changes to their MMIS.

The process requires the State to submit copies of the MMIS and MITA ConOps documents to the CMS SOT for review. The CMS SOT may use other CMS subject matter experts during the review. The CMS SOT schedules the consultation with CMS SOT the state to discuss comments to both ConOps documents and any necessary revisions before continuing to the next phase.

DEVELOP DRAFT SOLICITATION (9)

NOTE: AHCA utilizes the Invitation to Negotiate (ITN) procurement process instead of RFP for more flexibility in procuring these types of services. Throughout this document, use of the federal references to RFP also includes the ITN procurement process used in Florida.

During this phase of the lifecycle, the state prepares the solicitation(s) to implement the proposed requirements identified in the APD, MMIS and MITA ConOps, and the applicable Certification Checklists. Since AHCA plans to release modules on a staggered schedule, only the solicitation(s) for the first set of modules to be released need to be ready for the Project Initiation Milestone Review. Drafts of subsequent solicitations can be developed and reviewed later.

The draft solicitation wherever enforceable under state law should include the following provisions:

- Define goals and objectives
- Environment requirements (business, architecture, data)
- Reuse, interoperability, and modularity requirements
- Conditions tying compensation to meeting or exceeding defined goals (e.g., service level agreements)
- Reservation of right for the state to approved and/or remove subcontractors
- Require contractors to cooperate with other contractors (included IV&V)
- Require contracts to abide by all state's security and privacy policies

The state will send the draft Solicitation(s) to CMS SOT for review.

The SEAS vendor is responsible for analyzing the checklist set to inform development of the ITN requirements, then confirms the requirements and completes the final draft of the solicitation through a task order. All supporting activities in the development of the draft ITN are the responsibility of the SEAS vendor. AHCA will draft the cover letter and submit the final draft of the solicitation to CMS SOT for review and approval.

DEVELOP THE PROJECT MANAGEMENT PLAN (10)

During the completion of the draft solicitation, the state develops the plans necessary to proceed with the project. These plans will be submitted to CMS SOT in advance of the Project Initiation Milestone Review.

Plans developed in this step include development of the following:

- Project management plan
- Budget
- Risk register (waterfall) / exception plan (agile)
- Project schedule (waterfall) / milestones and burn-down charts (agile)
- System development lifecycle (SDLC)
- System Security Plan (SSP)
- Privacy Impact Analysis (PIA)

AHCA delegated the completion of the project management plan, risk register, project schedule, and SDLC to the SEAS vendor as either defined deliverables or through subsequently defined and agreed to task orders. AHCA completes the budget, System Security Plan, and Privacy Impact Analysis.

IV&V COMPLETES PROGRESS REPORT (11) (18) (20) (23) (26)

Throughout the FX project, the IV&V vendor is required to assess the state's progress and create a quarterly MMIS IV&V progress report. Progress reports are due quarterly and before each milestone review and intermittently throughout the SDLC.

Reports just preceding a Milestone Review (11, 23 and 26) require completion of the state sections of the applicable checklists. These completed checklists are stored in the state's Certification Repository. The IV&V vendor completes the reviewer sections of the checklists and the IV&V and Programmatic tabs of the MMIS IV&V Progress Report Template. The IV&V vendor submits the reports and checklists simultaneously to the state, the CMS SOT and the federal CMS MMIS Certification email address (MES @cms.hhs.gov).

Progress report 23 comes just before the Operational Milestone Review (R2) and reports on all activities conducted during the requirements, design and development, and integration, testing and implementation phase of the project. It also includes the delivery of all the completed version R2 MMIS Certification Checklists.

For the other progress reports (18 and 20), the IV&V vendor completes the progress report and sends it to the state and CMS SOT at the same time.

AHCA will approve an IV&V contract task order for each FX project to detail the schedule of report delivery that aligns with SEAS vendor and FX project vendor production of checklists and supporting artifacts. AHCA also requires all FX vendors to support the process by working with the IV&V vendor as requested to ensure the report is accurately represented. In addition, the IV&V vendor submits the reports and checklists simultaneously to AHCA, Agency for State Technology (AST), the CMS SOT, and the federal CMS MMIS Certification email address (MES @cms.hhs.gov).

It is important to note that as a part of the SEAS deliverable review process, the IV&V vendor is also responsible for reviewing and commenting on the other required artifacts noted in Appendix B of the MECT, such as the MITA SS-A, both ConOps, ITN, PIA, Security Plan, PMP, etc.

STATE SUBMITS IMPLEMENTATION ADVANCE PLANNING DOCUMENT (IAPD) (12)

The state completes an IAPD which is a plan of how the state envisions replacing their MMIS or adding modules to their existing FX solution. The IAPD serves as the formal request for 90/10 matching FFP to cover the DDI costs of the Medicaid information technology (IT) solution the state has chosen to implement.

The state prepares the IAPD drawing upon the previously developed documents including the PMP, the MITA and MMIS ConOps, and attaches the state's MITA SS-A and security plan. The state sends it to the CMS SOT to start the IAPD approval process.

The IAPD as required includes the following:

- Statement of need and objectives
- Requirements
- Alternatives analysis
- Reuse consideration
- Project management plan
- Proposed project budget and cost distribution
- Statement of security/interface and disaster recovery requirements
- Assurances
- Compliance with the Standards and Conditions for Medicaid IT

4.6.2 THE PROJECT INITIATION MILESTONE REVIEW (R1) (13A)

The first milestone review is scheduled within 30 days of the IAPD submission to CMS. The SEAS vendor supports AHCA during the execution of all milestone reviews as noted in **Section 4.5 Milestone Reviews**. The outcome of the Initiation Milestone Review is approval of the IAPD that allows the state to proceed with the procurement of the solution vendor and

subsequently the DDI phase. The purpose of this review is to ensure that the state has documented their goals and objectives using a fully developed MITA SS-A and roadmap, and a technical ConOps. CMS will also evaluate the state's business case, project management plan, and solicitation.

It is important to note that large projects seeking vendors to issue and award contracts through multiple solicitations do not have to replicate planning activities included in R1 for subsequent modules, under certain circumstances. Refer to the MECT 2.3 for detailed information.

- Future modules will have to go through R1 unless they are a cohort of modules that are designed, developed, and deployed around the same time, then they would be allowed to go through one R1-Project Initiation Milestone Review for all the cohorts

The Project Initiation Milestone Review consist of CMS reviewing the progress report and checklist and supplying comments in the CMS section of the report. The CMS review team may or may not include comments in the checklist. The milestone review is concluded when CMS sends copies of the completed progress report or a letter to the state and to the IV&V contractor.

These documents developed for the R1 Milestone Review:

- State goals and objectives
- Draft Solicitation
- MITA ConOps
- MITA Technical Management Strategy (if using agile SDLC)
- MITA Data Management Strategy (if using agile SDLC)
- MITA SS-A and MITA Roadmap
- MMIS ConOps
- IAPD
- State Security Policies/ Security Plan
- Privacy Impact Analysis
- Project Management Plan
- Schedule (or milestones and burn-down charts)
- Risk Management Plan and Risk Registry

See **Exhibit 6-7: Certification Milestone Review Required Artifacts Matrix** for more details on the responsible parties for delivering or producing these artifacts.

IAPD APPROVAL (13B)

The state and CMS SOT follow the existing APD process. The IAPD approval activity is shown in the certification life cycle only to indicate where the MECL and the APD processes overlap.

4.6.3 REQUIREMENTS, DESIGN, AND DEVELOPMENT PHASE

During this phase of the project, AHCA begins its procurement process and performs the following actions:

- Documents system requirements
- Designs the system
- Undergoes an IV&V requirements and design review
- Documents test/validation plans
- Cooperates with the IV&V contractor on progress reports
- Develops MMIS modules

IAPDU REVIEW AND APPROVAL (14)

This phase of the project is initiated with the approval of the IAPD and signals the beginning of the procurement process for selecting vendors to supply services requested in the IAPD. Over the course of a long project, the state makes updates to their IAPD to include additional information that may be required for a successful implementation. CMS reviews these IAPD updates to determine whether to approve revisions. This IAPD review and approval does not require another Project Initiation Milestone Review.

AHCA plans to implement multiple modules at different times throughout this phase and therefore, expects to make multiple updates to its IAPD in concert with the SEAS vendor. The SEAS vendor is responsible for supporting AHCA in producing IAPDs for subsequent modules or functionality that are planned for as a part of the FX Project.

The input to this activity is the updated IAPD and the output is a decision from CMS SOT regarding approval and a release of funds.

STATE PROCUREMENT PROCESS BEGINS (15)

During this phase, the state follows its procurement processes to contract with vendors to develop, integrate and update the state's MMIS. CMS SOT reviews and approves these contracts as they are completed and executed.

As previously mentioned, AHCA utilizes the ITN process as prescribed by the State of Florida to procure services. AHCA plans to release multiple ITNs for specific modules over the coming months and years as a part of the replacement of the MMIS.

REQUIREMENTS AND PRELIMINARY DESIGN (16)

In this step, the state, in conjunction with its contractors, documents system requirements, system design, and develops a plan for testing the implementation of the requirements. It is expected that the requirements and design are improved over the course of time.

The FX solution vendor is responsible for conducting requirements specification reviews. The FX solution vendor is expected to trace all requirements to the MECT Certification criteria in the Certification checklists as well. AHCA and its FX solution vendor documents system requirements, design and test plans.

During this phase, the FX solution vendor is expected to provide the following for each module:

- System Design Documents / backlog of user stories
- Information System Security Assessment
- Test Plans
- Interface Control Document
- Database Design
- Data Conversion / Management Plan
- Implementation Plan
- Contingency / Disaster Recovery Plan
- Data use/ exchange interconnection security agreements

The inputs for this activity are the MITA technical strategies, MITA ConOps, MMIS ConOps, and the certification checklist, including critical success factors. The output is a set of technical designs and requirements/use cases or user stories.

REQUIREMENTS AND DESIGN REVIEW (17)

The IV&V vendor conducts SDLC reviews of the requirements and design gate reviews evaluating the states requirements, design, and test plans for accuracy, completeness and internal consistency. The purpose is to identify gaps and issues that need to be addressed by the state and its contractors.

Artifacts reviewed by the IV&V vendor during these reviews include:

- System design documents, or if the state is purchasing a COTS system, an interface design document
- System Security Plan
- Information System Security Assessment

- Test Plans
- Interface Control Document
- Database Design
- Data Conversion / Data Management Plan
- Implementation Plan
- Contingency / Recovery Plan
- Data Use / Exchange interconnection Security Agreement

Because AHCA is planning to procure multiple modules, this review is expected to be completed for each module as it is procured.

CMS REVIEWS THE PROGRESS REPORT (19)

The MMIS IV&V Progress report has three sections. The IV&V vendor completes the section with its findings and programmatic tab and CMS SOT completed the third section to record their response and comments.

CMS SOT may send questions to the state for additional information and documents any comments and concerns after reviewing the IV&V vendor findings.

AHCA includes the frequency of these reports in the IV&V contract through task orders for each FX project; CMS requires a quarterly report, at a minimum. The Quarterly Report can be used to prepare for a milestone review, should the schedules align.

DEVELOP (21)

The majority of the design and development work is done in this phase as AHCA and the FX solution vendors work to develop and upgrade the FX module functionality including clarifying requirements and code development. The SEAS vendor and IV&V vendor continue to be involved in tracking progress and ensuring final MMIS Certification is achieved in the outcomes.

Because AHCA is planning a modular update to the Florida MES, this step will occur at different times for each module as it reaches this stage.

4.6.4 INTEGRATION, TEST AND IMPLEMENTATION PHASE

The second milestone review occurs toward the end of the integration, testing and implementation phase. This second milestone review is expected to be scheduled when AHCA reaches the end of user acceptance testing (UAT) and before the ‘go/no go’ decision to implement the new module.

The state will perform the following actions:

- Integrate modules
- Test the integrated system
- Cooperate with IV&V as periodic MMIS IV&V Progress Reports are prepared
- Undergo Operational Milestone Review(s)
- Deploys the system/newly developed modules into production

TEST AND EVALUATE (22)

During this testing phase, the state and its contractors test and evaluate the MMIS functionality and performance with the newly implemented requirements and enhancements tracing the requirements that were tested and document the test results.

UAT is used with both agile and waterfall approaches where users validate that the changes meet their expectations. Test reports or product validation reports show how the system was tested against the documented requirements or user stories.

Testing is an important part of validating that requirements have been met. It is also important to ensure the requirements associated with specific MMIS Certification criteria are successfully implemented. AHCA and the SEAS vendor are heavily involved in overseeing and tracking system integration testing (SIT) and executing and tracking UAT. Thus, it is important to track testing activities with AHCA MES users as well as solution vendor staff to ensure the required functionality is implemented from a contractual perspective as well as from a federal compliance perspective.

4.6.5 THE OPERATIONAL MILESTONE REVIEW(S) (R2)

During this review, CMS and the IV&V vendor evaluate the functionality and security of modules that are ready for deployment. The state and CMS agree on a schedule for the review. It covers only the set of modules ready for deployment. The IV&V vendor must have submitted a progress report with completed checklists to the state, CMS SOT, and the MMIS Certification email box. All evidence and required artifacts must be available in an accessible repository for review. The SEAS vendor supports AHCA during the execution of all milestone reviews as noted in **Section 4.5 Milestone Reviews**.

There will be more than one R2-Operational Milestone Review as modules will likely be ready to be implemented at different times. Therefore, these reviews will be conducted for each module separately as it is implemented. The R2-Operational Review may be executed as a cohort for more than one module at the same time, depending on the stage of development for each of the modules.

The R2 can be completed on site or virtually depending on CMS Certification Review Team's evaluation of the IV&V progress report and provided project artifacts. In this milestone many of

the same items reviewed in R1 are reviewed in R2; however there also is a focus on the Certification checklists and the evidence. States are expected to also demonstrate the solution and provide details on the testing efforts associated it.

Artifacts reviewed during this R2-Operational Milestone Review include:

- Working Module(s)
- State Security Policy/ Security Plan
- Privacy Impact Analysis
- New Medicare Card Program State Medicaid Agency Readiness Report
- Project Management Plan
- Project Schedule / Milestones
- Risk Management Plan and Risk Register
- Test Plan
- Incident Management Plan
- Change Management Plan
- Configuration Management Plan
- Information Security Risk Assessment
- Database Design
- Data Conversion / Management Plan
- Business Continuity / Contingency / Recovery Plans
- Test Reports / Validated Product Reports
- System Design Document (SDD)
- System Requirement Document / Backlog of User Stories or Use Cases
- Product Documentation
- Roll Out Plan
- HIPAA Statement

See **Exhibit 6-7: Certification Milestone Review Required Artifacts Matrix** for more details on the responsible parties for delivering or producing these artifacts.

CMS CONDUCTS THE R2-OPERATIONAL MILESTONE REVIEW (24)

This review evaluates the functionality and security of the FX modules that are ready to be implemented. The state and CMS agree on a schedule for the review. As subsequent modules are completed, separate reviews are scheduled. In preparation for this review, the IV&V vendor

submits a Progress Report with the Operational Milestone Review section of the checklist completed to both CMS SOT and the CMS MMIS Certification email box. The FX solution vendor(s) work with AHCA, and the SEAS vendor to update the checklists, identify and capture evidence that validates the MECT criteria. The checklists, evidence, and other artifacts must be stored in a repository that is accessible by the IV&V vendor, CMS SOT, CMS Certification Review Team.

Many of the artifacts examined during this milestone review would have previously been developed as a part of the R1-Initiation Milestone Review and should be updated as necessary.

OPERATIONS AND MAINTENANCE (O&M PHASE)

This is the final phase of the project's system development. During this time, AHCA operates the MMIS modules according to the state's processes and procedures, ensuring that the newly implemented modules perform as planned.

Additionally, the IV&V vendor reviews the working module(s) and all artifacts required for the MMIS Certification Final Review to evaluate if the module(s) is ready for final review. This information is captured in the final progress report (26).

During this phase, AHCA and the SEAS vendor continue preparing for the final MMIS Certification review, by finalizing plans and gathering documentation needed for final MMIS Certification.

CERTIFICATION REQUEST (25)

The new system or module must be operational for at least six months before requesting the final MMIS Certification Milestone Review. To initiate this, AHCA prepares a request letter that includes the following information, as it applies to the module for which certification is being requested:

- The date the system / module(s) became fully operational
- A copy of AHCA's letter to the MMIS contractor or state development team accepting the system / module(s)
- A proposed timeframe for the final review
- A declaration that AHCA's enhanced MES meets all requirements of law and regulation including:
    - 42 CFR 433.117 for all periods for which the 75% FFP is being claimed
    - All necessary documentation required for MMIS Certification Final Milestone Review, including a copy of the latest New Medicare Card Program Readiness Report, has been provided to CMS, per the Medicaid Enterprise Certification Toolkit

- Issues Explanation of Benefits (EOBs) on a regular basis for all periods for which 75% FFP is being claimed, in accordance with the provisions of Section 10 of P.L.95142, which amends section 1903(a)(3) of the Social Security Act
- Is ready for MMIS Certification, based on the state's evaluation using the checklists in the Toolkit
- The system is routinely backed up
- Adjudicates claims and information required for payment of services in accordance with all provisions of 42 CFR 447 and the approved state Medicaid plan
- Generates up-to-date and accurate Transformed Medicaid Statistical Information System (T-MSIS) data
- Exercises appropriate privacy and security controls over the system in accordance with 45 CFR Part 164, P.L. 104-191, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and 1902(a)(7) of the Social Security Act as further interpreted in regulations at 42 CFR 431.300 to 307

NOTE: CMS provides a template for this letter in the MECT 2.3 Toolkit that includes the above information.

4.6.6 MMIS CERTIFICATION FINAL REVIEW(S) (R3)

In this final review, CMS evaluates the FX modules to determine whether to certify the module(s) and release FFP funds to AHCA for MMIS maintenance and operation of the new module(s). R3-MMIS Certification Final Reviews may be executed for more than one module as a cohort at the same time, depending on the stage of development for each of the modules. In addition to the general information detailed in **Section 4.5 Milestone Reviews** that is completed for all milestone reviews, for R3 the Certification checklists and the artifacts specifically required by CMS include:

- Working MMIS Module(s)
- Official Certification request letter
- Samples of six months of operating data
- Substantive and representative set of all reports and information retrieval screens preferably in an electronic format
- List of information retrieval functions and reports for each business area (including a list identifying distribution of reports and who can access the information retrieval displays)
- Evidence that Transformed Medicaid Statistical Information System (T-MSIS) data requirements are met for timeliness and data quality

These artifacts were previously developed for the R2 review and are updated as necessary for the R3 review:

- Incident Management Plan
- Change Management Plan
- Database Design
- Data Conversion / Management Plan
- Business Continuity / Contingency / Recovery Plans
- Test Reports / Validated Product Reports
- System Design Document (SDD)
- System Requirement Document / Backlog of User Stories or Use Cases
- Product Documentation
- HIPAA Statement

These documents were developed for the R1-Project Initiation Milestone and should be updated, as necessary for the R3 review:

- MITA ConOps
- MITA Technical Management Strategy (if using agile SDLC)
- MITA Data Management Strategy (if using agile SDLC)
- MITA SS-A and MITA Roadmap
- MMIS ConOps
- IAPD
- State Security Policies/ Security Plan
- Privacy Impact Analysis
- New Medicare Card Program State Medicaid Agency Readiness Report

See **Exhibit 6-7: Certification Milestone Review Required Artifacts Matrix** for more details on the responsible parties for delivering or producing these artifacts. During the first day of the R3, AHCA will conduct an entrance conference with the CMS Certification Review Team that will include team introductions, overview of the Medicaid Program and the FX Project. The CMS Certification Reviewers will expect a tour of the facility and expect to get instructions on how to log in to the various systems and applications necessary for their review. Once all Certification Checklists are reviewed the last day will consist of follow ups as needed and end with an exit conference.

SECTION 5 CHECKLISTS

5.1 LIFE OF THE CHECKLISTS

Exhibit 5-1: The Life Cycle of Checklists The Life Cycle of Checklists illustrates a high-level evolution of the checklist. AHCA and the IV&V vendor complete the relevant sections for each checklist throughout the FX Module project lifecycle. The checklists build upon information supplied in the previous sections completed for each milestone review until the entire checklist is completed prior to execution of the R3-MMIS Certification Final Review.

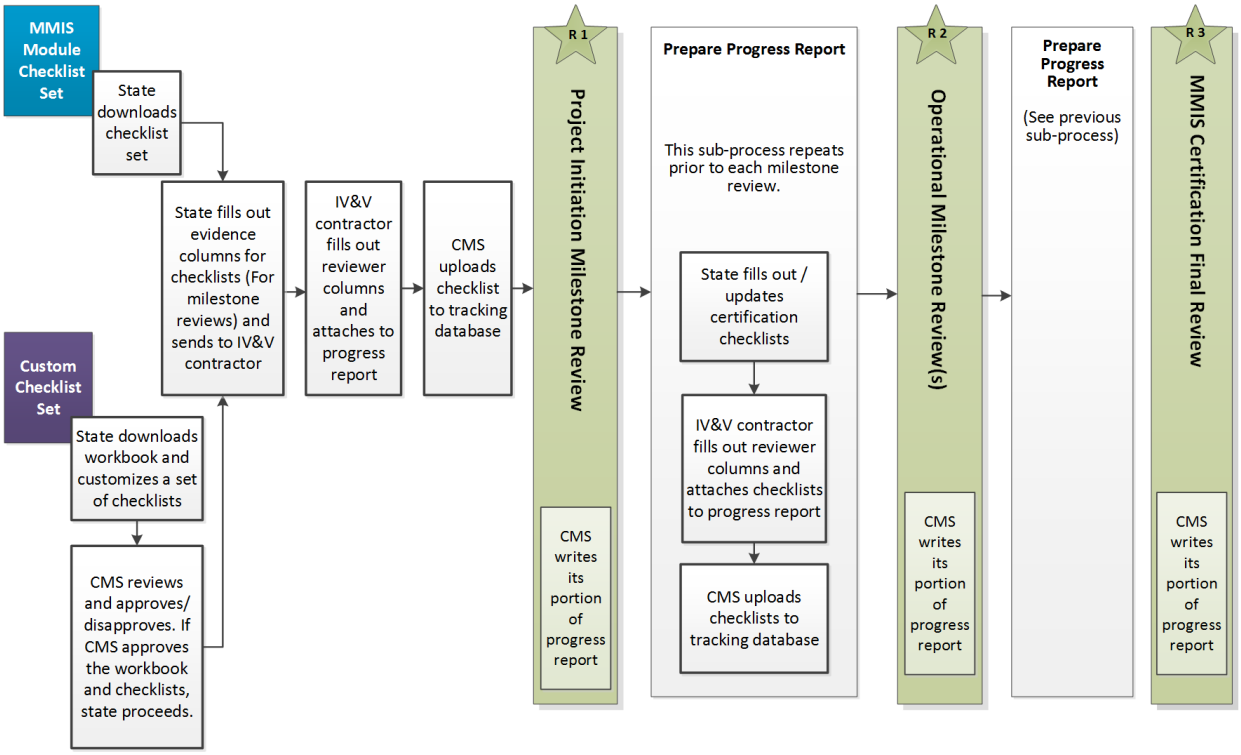


Exhibit 5-1: The Life Cycle of Checklists

There are two checklist set options: the MMIS Module and a rarely used custom checklist, which must have advance approval from CMS. In the initial consultation with CMS, AHCA discusses the preliminary decision on the best checklist set to use for the procurement, and a final decision is made.

With the evolution of Outcome-based Certification the checklist will no longer be applicable and will be phased out as new modules are incorporated. The P-4: Medicaid Enterprise Certification Plan will be updated to reflect the change in checklist requirements once CMS issues further guidance.

5.2 Explanation of the Certification Checklist Set Options

The MECT 2.3 Certification Checklists reflect current regulations, MITA Architectures (business, information, and technical) and Standards and Conditions for Medicaid information technology. These checklists are used throughout the MECL and support various approaches states can use to implement MMIS systems including modular, phased, waterfall and agile.

During the initial planning stage, AHCA, CMS SOT, and the SEAS vendor select the checklists that AHCA will use throughout the MECL. For AHCA, this means that all ITNs should be developed with the MECT checklists as a foundation.

As previously mentioned, there are two checklist options to choose. The first option is the MMIS module checklists for states with MMIS system-centric modules. The second option is a custom-tailored set of checklists arranged by the state for exceptional cases and is only used for non-traditional solutions. This last approach requires prior approval from CMS.

Exhibit 5-2: MMIS Checklist Set and Customized Checklist illustrates the two checklist options.

MMIS Module Checklist Set	Customized Checklist Set
• Member Enrollment • FFS Claims & Adjudication • Pharmacy • Third Party Liability • Care Management • Program Integrity • Decision Support System • Reference Data Management • Provider Management • Registries • Information Architecture • Technical Architecture—Access and Delivery • Technical Architecture—Integration and Utility • Technical Architecture—Intermediary and Interface • Standards and Conditions for Medicaid IT	• Checklist determined by the state and approved by CMS • Information Architecture • Technical Architecture—Access and Delivery • Technical Architecture—Integration and Utility • Technical Architecture—Intermediary and Interface • Standards and Conditions for Medicaid IT

Exhibit 5-2: MMIS Checklist Set and Customized Checklist

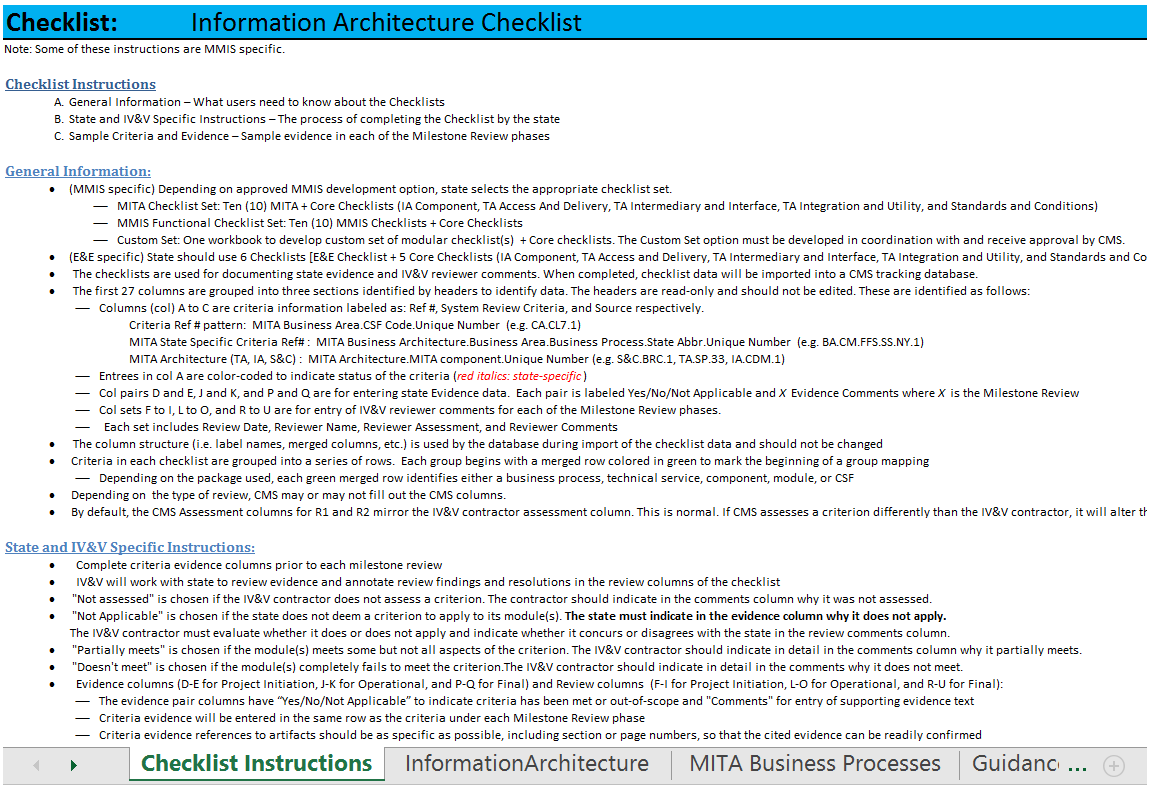
5.3 Overview of the Checklist Format

Each checklist is a Microsoft Excel workbook with tabs. The first tab includes the checklist instructions, the second tab contains the actual checklist, and the third tab is the MITA

business areas. Additionally, there are five core checklists representing the Information Architecture, Technical Architecture and CMS Standards and Conditions Checklists that all have guidance tabs on acceptable evidence to demonstrate the system complies with the MMIS Certification criteria.

5.3.1 CHECKLIST—FIRST TAB

Exhibit 5-3: First Tab of All Checklists is a screenshot of the first tab of the checklists. This tab is on both checklists sets and provides checklist instructions for state and IV&V vendor completion.



Checklist: Information Architecture Checklist

Note: Some of these instructions are MMIS specific.

Checklist Instructions

A. General Information – What users need to know about the Checklists
B. State and IV&V Specific Instructions – The process of completing the Checklist by the state
C. Sample Criteria and Evidence – Sample evidence in each of the Milestone Review phases

General Information:

- (MMIS specific) Depending on approved MMIS development option, state selects the appropriate checklist set.
  - MITA Checklist Set: Ten (10) MITA + Core Checklists (IA Component, TA Access And Delivery, TA Intermediary and Interface, TA Integration and Utility, and Standards and Conditions)
  - MMIS Functional Checklist Set: Ten (10) MMIS Checklists + Core Checklists
  - Custom Set: One workbook to develop custom set of modular checklist(s) + Core checklists. The Custom Set option must be developed in coordination with and receive approval by CMS.
- (E&E specific) State should use 6 Checklists [E&E Checklist + 5 Core Checklists (IA Component, TA Access and Delivery, TA Intermediary and Interface, TA Integration and Utility, and Standards and Co
- The checklists are used for documenting state evidence and IV&V reviewer comments. When completed, checklist data will be imported into a CMS tracking database.
- The first 27 columns are grouped into three sections identified by headers to identify data. The headers are read-only and should not be edited. These are identified as follows:
  - Columns (col) A to C are criteria information labeled as: Ref #, System Review Criteria, and Source respectively.
    Criteria Ref # pattern: MITA Business Area.CSF Code.Unique Number (e.g. CA.CL7.1)
    MITA State Specific Criteria Ref# : MITA Business Architecture.Business Area.Business Process.State Abbr.Unique Number (e.g. BA.CM.FFS.SS.NY.1)
    MITA Architecture (TA, IA, S&C) : MITA Architecture.MITA component.Unique Number (e.g. S&C.BRC.1, TA.SP.33, IA.CDM.1)
  - Entrees in col A are color-coded to indicate status of the criteria (*red italics: state-specific*)
  - Col pairs D and E, J and K, and P and Q are for entering state Evidence data. Each pair is labeled Yes/No/Not Applicable and *X* Evidence Comments where *X* is the Milestone Review
  - Col sets F to I, L to O, and R to U are for entry of IV&V reviewer comments for each of the Milestone Review phases.
  - Each set includes Review Date, Reviewer Name, Reviewer Assessment, and Reviewer Comments
- The column structure (i.e. label names, merged columns, etc.) is used by the database during import of the checklist data and should not be changed
- Criteria in each checklist are grouped into a series of rows. Each group begins with a merged row colored in green to mark the beginning of a group mapping
  - Depending on the package used, each green merged row identifies either a business process, technical service, component, module, or CSF
- Depending on the type of review, CMS may or may not fill out the CMS columns.
- By default, the CMS Assessment columns for R1 and R2 mirror the IV&V contractor assessment column. This is normal. If CMS assesses a criterion differently than the IV&V contractor, it will alter th

State and IV&V Specific Instructions:

- Complete criteria evidence columns prior to each milestone review
- IV&V will work with state to review evidence and annotate review findings and resolutions in the review columns of the checklist
- "Not assessed" is chosen if the IV&V contractor does not assess a criterion. The contractor should indicate in the comments column why it was not assessed.
- "Not Applicable" is chosen if the state does not deem a criterion to apply to its module(s). **The state must indicate in the evidence column why it does not apply.**
  The IV&V contractor must evaluate whether it does or does not apply and indicate whether it concurs or disagrees with the state in the review comments column.
- "Partially meets" is chosen if the module(s) meets some but not all aspects of the criterion. The IV&V contractor should indicate in detail in the comments column why it partially meets.
- "Doesn't meet" is chosen if the module(s) completely fails to meet the criterion.The IV&V contractor should indicate in detail in the comments why it does not meet.
- Evidence columns (D-E for Project Initiation, J-K for Operational, and P-Q for Final) and Review columns (F-I for Project Initiation, L-O for Operational, and R-U for Final):
  - The evidence pair columns have "Yes/No/Not Applicable" to indicate criteria has been met or out-of-scope and "Comments" for entry of supporting evidence text
  - Criteria evidence will be entered in the same row as the criteria under each Milestone Review phase
  - Criteria evidence references to artifacts should be as specific as possible, including section or page numbers, so that the cited evidence can be readily confirmed

Checklist Instructions | InformationArchitecture | MITA Business Processes | Guidanc ...

Exhibit 5-3: First Tab of All Checklists

5.3.2 CHECKLISTS - SECOND TAB

Exhibit 5-4: Second Tab of All Checklists provides a partial example of the second tab of the checklists. All checklists contain a predefined set of Certification Review Criteria which is located on the second tab of all checklists. AHCA, the SEAS Vendor, Solution Vendors and IV&V vendor record information on this tab. The state and the IV&V vendor have designated sections to complete for each of the three milestone reviews. The SEAS vendor helps AHCA complete Section 1, while the Solution Vendors have responsibilities for completing the R2 and R3 Sections. This one document tracks the MECT criteria to the specific requirements

beginning in the R-1-Project Initiation Milestone Review through to the R-3-MMIS Certification Final Review. This evolution of the checklist throughout the MECL allows AHCA to demonstrate to CMS how it is progressing toward ensuring all criteria are met utilizing the checklist's critical success factors throughout the lifecycle of each FX module. The critical success factors outline system functionality required for each business module to satisfy CMS certification. IV&V's documented evaluation commentary that is also captured on the second table is later used by the CMS Certification Review Team to assist in their review. The SEAS vendor assists AHCA with the completion of the R1 state identified section of the checklists for each FX module that is subject to MMIS Certification while the Solution Vendors complete the R2 and R3 sections on behalf of AHCA. The IV&V Vendor completes their designated sections for all milestone reviews once the state's fields are complete.

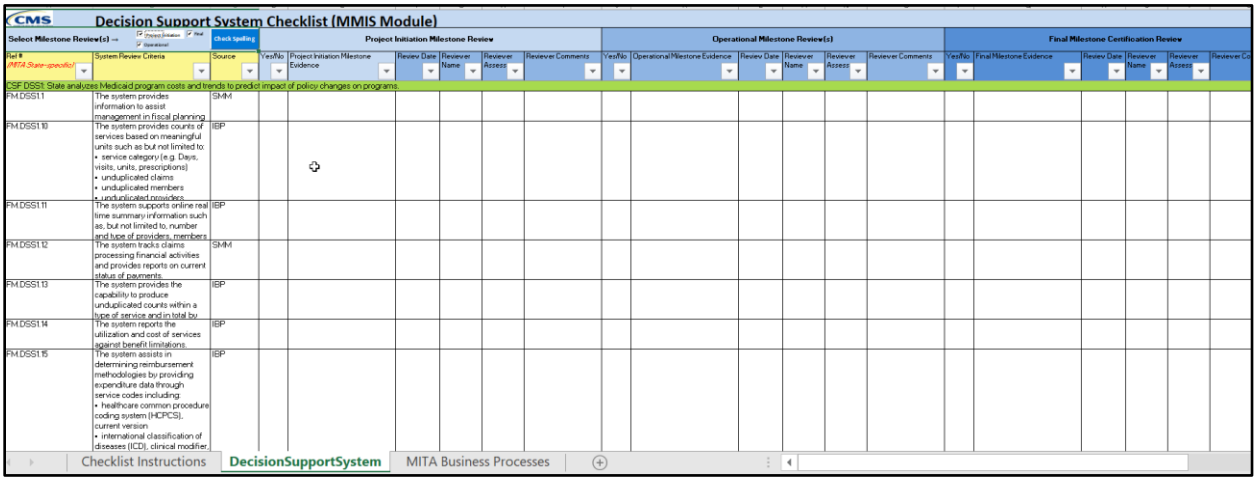


Exhibit 5-4: Second Tab of All Checklists

5.3.3 CHECKLISTS—THIRD TAB

MMIS MODULE CHECKLIST

The third tab of the MMIS Module Checklist set contains the MITA business processes cross-walked to the criteria reference number. For example: OM.PH1.1: "The system ensures that all claims are assigned a unique identification number upon entering the system" comes from the Operations Management business area under the 'Process Claims' business process. This is presented in **Exhibit 5-5: Third Tab of the MMIS Module Checklists-MITA Business Processes.**

Note: This sheet shows mapping of MITA Business Area, Business Process, and Criteria to reflect alignment to MITA Goals & Objectives for MMIS Modules

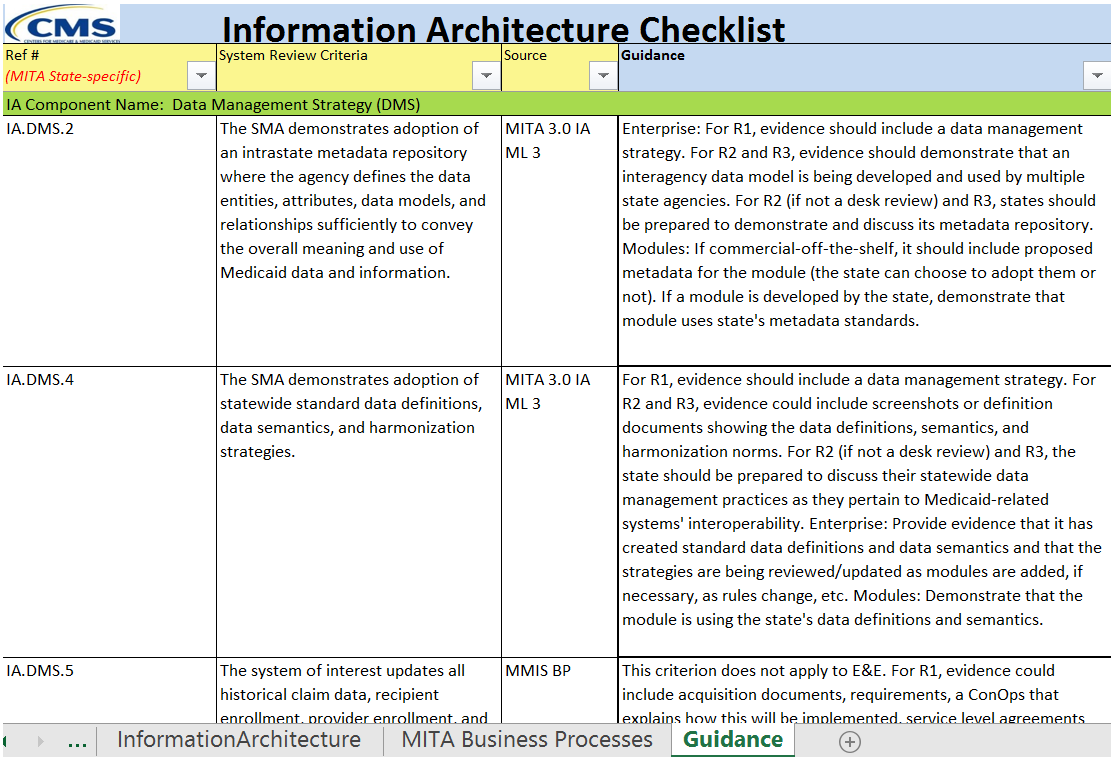
Business Area	Business Process	Criteria Ref #
Care Management	Authorize Treatment Plan	CM.PH3.1
Care Management	Authorize Treatment Plan	CM.PH3.2
Financial Management	Manage Drug Rebate	FM.PH6.1
Financial Management	Manage Drug Rebate	FM.PH6.2
Financial Management	Manage Drug Rebate	FM.PH6.3
Financial Management	Manage TPL Recovery	FM.PH5.1
Financial Management	Manage TPL Recovery	FM.PH5.2
Member Management	Manage Member Information (Under Development)	ME.PH1.1
Operations Management	Generate Remittance Advice	OM.PH2.1
Operations Management	Generate Remittance Advice	TA.CS.2
Operations Management	Process Claims	OM.PH1.1
Operations Management	Process Claims	OM.PH2.10
Operations Management	Process Claims	OM.PH2.11
Operations Management	Process Claims	OM.PH2.13
Operations Management	Process Claims	OM.PH2.14
Operations Management	Process Claims	OM.PH2.15
Operations Management	Process Claims	OM.PH2.16
Operations Management	Process Claims	OM.PH2.17

Checklist Instructions | Pharmacy | **MITA Business Processes**

Exhibit 5-5: Third Tab of the MMIS Module Checklists-MITA Business Processes

5.3.4 CORE CHECKLISTS—FOURTH GUIDANCE TAB

Only the five Core checklists contain a fourth tab as illustrated in **Exhibit 5-6: Fourth Tab of the Core Checklists-Guidance** which provides states with guidance on what can be presented as evidence to demonstrate to the CMS Certification Review Team that the criteria have been met.



Information Architecture Checklist

Ref # (MITA State-specific)	System Review Criteria	Source	Guidance
IA Component Name: Data Management Strategy (DMS)			
IA.DMS.2	The SMA demonstrates adoption of an intrastate metadata repository where the agency defines the data entities, attributes, data models, and relationships sufficiently to convey the overall meaning and use of Medicaid data and information.	MITA 3.0 IA ML 3	Enterprise: For R1, evidence should include a data management strategy. For R2 and R3, evidence should demonstrate that an interagency data model is being developed and used by multiple state agencies. For R2 (if not a desk review) and R3, states should be prepared to demonstrate and discuss its metadata repository. Modules: If commercial-off-the-shelf, it should include proposed metadata for the module (the state can choose to adopt them or not). If a module is developed by the state, demonstrate that module uses state's metadata standards.
IA.DMS.4	The SMA demonstrates adoption of statewide standard data definitions, data semantics, and harmonization strategies.	MITA 3.0 IA ML 3	For R1, evidence should include a data management strategy. For R2 and R3, evidence could include screenshots or definition documents showing the data definitions, semantics, and harmonization norms. For R2 (if not a desk review) and R3, the state should be prepared to discuss their statewide data management practices as they pertain to Medicaid-related systems' interoperability. Enterprise: Provide evidence that it has created standard data definitions and data semantics and that the strategies are being reviewed/updated as modules are added, if necessary, as rules change, etc. Modules: Demonstrate that the module is using the state's data definitions and semantics.
IA.DMS.5	The system of interest updates all historical claim data, recipient enrollment, provider enrollment, and	MMIS BP	This criterion does not apply to E&E. For R1, evidence could include acquisition documents, requirements, a ConOps that explains how this will be implemented, service level agreements

... | InformationArchitecture | MITA Business Processes | Guidance

Exhibit 5-6: Fourth Tab of the Core Checklists-Guidance

5.3.5 EXPLANATION OF THE CHECKLIST COLUMNS

CMS prepopulates the first three columns with the Reference # associated with the System Review Criteria, the text of the System Review Criteria, and the criteria Source. These columns are highlighted in yellow and cannot be edited as illustrated in **Exhibit 5-6: Fourth Tab of** the Core Checklists-Guidance.

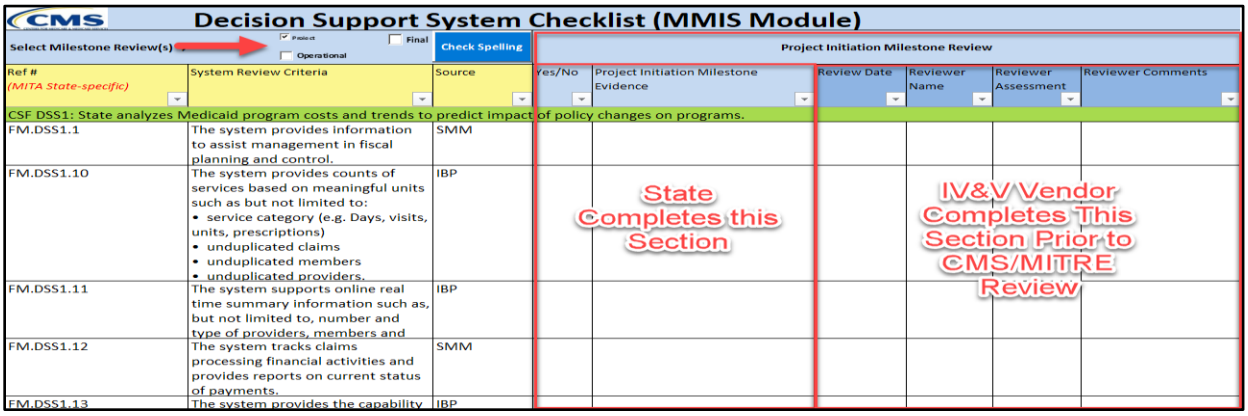


Exhibit 5-7: Sample DSS Checklist

All the checklist criteria are assigned a unique number called a Ref. #. The Ref. # format is: *MITA Business Area*. *Critical Success Factor Code*. *Unique Number* (e.g., FM.DSS.1.1).

The remainder of the spreadsheet has the following evidence columns repeated for each of the three milestone reviews. These evidence columns are completed before each milestone review.

Exhibit 5-8: Checklist Columns and Values summarizes the column names, who completes the column, and the expected contents.

COLUMN	COMPLETED BY	CONTAINS
Yes/No	AHCA/SEAS vendor	Values are: *Yes – function is performed in the module being assessed,* *No - Function is performed in another module of the enterprise system (and indicate which module in Evidence cell)* *Not Applicable- criterion is not a part of the State Plan or policies*
Milestone Evidence	AHCA/SEAS vendor or Solution vendor	Enter the location of the evidence which will be a hyperlink to the FX Project Repository site that contains a document for each criterion
Review Date	IV&V vendor	The date the IV&V reviewer reviews the milestone evidence
Reviewer Name	IV&V vendor	The name of the IV&V reviewer
Reviewer Assessment	IV&V vendor	Values are *Meets*, *Partially Meets*, *Doesn't Meet*, *Not Assessed*, See Exhibit 5-9 for details regarding each value
Reviewer Comments	IV&V vendor	Includes comments for supporting evidence

Exhibit 5-8: Checklist Columns and Values

For each criterion on a checklist, the IV&V Reviewer will assess whether the evidence supplied by AHCA, the SEAS vendor, and FX Solution Vender is sufficient to meet the associated MECT Criterion. **Exhibit 5-9: Reviewer Assessment Values** provides the standard values the IV&V Vendor uses to assess whether the supplied evidence supports the criterion.

REVIEWER ASSESSMENT	DESCRIPTION	NOTES
Meets	The included evidence meets the system review criteria	If selected, the Yes/No column should contain a Yes with evidence supporting this decision
Not assessed	Selected if the criterion is not assessed	Used if the IV&V vendor does not assess a criterion and indicates why the criteria was not assessed in the Comments column
Partially meets	Chosen if the module meets some but not all aspects of the criterion	Reason noted in the Comment column
Doesn't Meet	Selected when the module fails to meet the criterion	Reason noted in the Comment column

Exhibit 5-9: Reviewer Assessment Values

5.4 CHOOSING THE CHECKLIST SET

As AHCA plans to move toward a more modular and enterprise MMIS, it is expected that most planned modules will utilize the MMIS Module Checklists. However, if there is not an obvious fit, the module project team will determine the best checklist to meet the State's needs.

AHCA will schedule a call with CMS SOT to discuss the best checklist for the proposed new module. Prior to the call, the SEAS vendor will provide AHCA an overview of how the recommended checklist set was identified and how it is expected to be used for the applicable FX Project(s).

During the call with CMS SOT, AHCA presents their preferred approach for implementing the module and provides their preferred MECT Version 2.3 checklist to be used for MMIS Certification. AHCA, with support of the SEAS vendor, explains how the checklists will be maintained throughout the development and implementation life cycle of applicable modules.

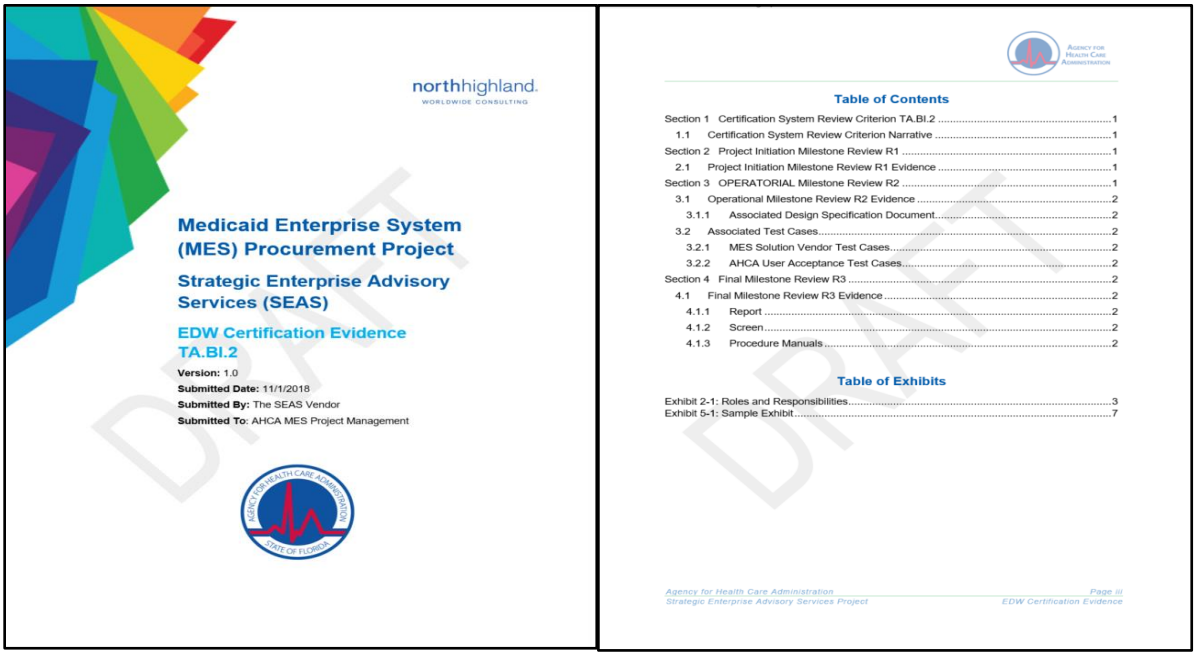
Analysis of the system requirements and the criteria will need to be performed to identify the checklists and the associated criteria. Using the EDW as an example, the Decision Support System Checklist (MMIS Module), most of the Program Integrity Checklist items, and the items from the five Core Checklists will make up most of the criteria needed to certify an Enterprise Data Warehouse.

5.5 CHECKLIST COMPLETION

After the appropriate checklist(s) are identified for R1, the SEAS vendor completes the R1 Section of the checklists for review and approval by the Agency prior to being provided to the FX vendors in the ITN. For R2 and R3 the Solution Vendor is responsible for completing the checklists.

For all the milestones, the R1, R2 and R3 version of the checklists are added to the dedicated MMIS Certification folder for the appropriate milestone in the FX Project Repository site until a nonproprietary Certification tool is operational. The SEAS vendor helps AHCA complete the Yes/No column for R1 and the Solution Vendor is responsible for completing them in the designated sections for R2 and R3.

All milestone sections of the Certification checklists should include links to the supporting evidence for each criterion included in the checklist(s). One URL is entered in the evidence column. The URL navigates reviewers to an evidence document that contains links to other documents that serve as evidence. The SEAS vendor creates a Certification Evidence Template that is used for all FX module MMIS Certifications to ensure consistency in MMIS Certification documentation across all FX Modules. Evidence documents contain the MMIS Certification criteria number in the file name by MMIS Module Checklist set if this checklist is selected. **Exhibit 5-10: FX Certification Evidence Example** illustrates the Table of Contents. Refer to Appendix A: FX Certification Evidence Template of this document to review all pages.



northhighland.
WORLDWIDE CONSULTING

Medicaid Enterprise System (MES) Procurement Project

Strategic Enterprise Advisory Services (SEAS)

EDW Certification Evidence TA.BI.2

Version: 1.0
Submitted Date: 11/1/2018
Submitted By: The SEAS Vendor
Submitted To: AHCA MES Project Management

DRAFT

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Exhibit 5-10: FX Certification Evidence Example

5.6 CHECKLIST LINKS

It is important that AHCA maintain a clear, simple linkage between the checklist criterion and the supporting evidence. It is also important that the FX solution vendor participate in the identification of supporting evidence and assist in providing access to such evidence. AHCA will develop protocols for providing access to the CMS Certification Review Team for milestone review artifacts, checklists, and evidence. CMS will be conducting reviews offsite so remote access to the FX project site will be critical since it is the CMS preferred method of access and review for early milestone reviews.

The IV&V vendor reviews the checklists offline, then completes their review and provides comments in the actual checklists and emails them and their findings to AHCA and CMS at the same time. Once AHCA receives the checklists from IV&V, AHCA stores the IV&V-generated versions in the Certification Repository on the FX Project repository.

In the next MMIS IV&V Progress Report for the module, AHCA uses the latest version of the checklists from the last MMIS IV&V Progress Report, updates the evidence columns, sends the updated checklists, or notification of checklist availability, to the IV&V vendor, and then the process repeats.

5.7 CERTIFICATION REPOSITORY FOR FX PROJECTS

The creation and organization of a certification repository structure has been well thought out to address multiple needs:

- Comply with security requirements
- Work with FX Project Repository limitations to accommodate State and Solution Vendor working with documents as well as restricted access to final documentation approved for IV&V and CMS review
- Mitigate the need for additional work to reestablish documentation links to artifact or checklist evidence that occur due to repository structure
- Provide user accessibility to accommodate CMS Certification Review Team members who will be performing reviews remotely since some of the milestone reviews will be completely virtual
- Provide for future storage and access to meet the CMS requirement that states maintain MMIS Certification related documents for at least two years after certification is received

The FX Certification Repository consists of a home page for information about FX certification management, information, meetings, tools/templates, and calendar, and links to sub-sites for each active FX certification project. Dashboards will be added as they are developed.

Exhibit 5-11: FX Certification Repository provides a view of the Certification home page and the EDW-IS/IP project sub-site.

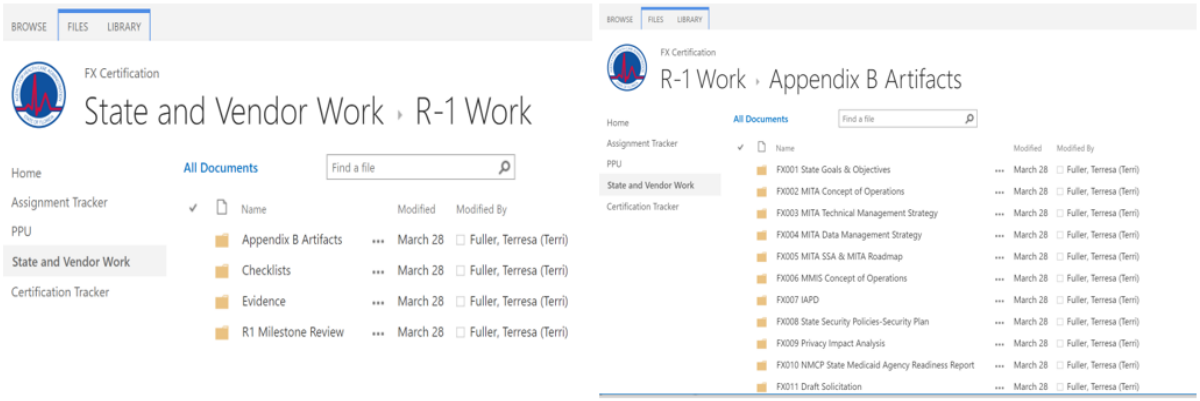


Exhibit 5-11: FX Certification Repository

Each FX certification project sub-site provides the Certification Assignment Tracker and timeline, the Project Partnership Understanding (PPU), contact list, document libraries for State and Vendor Work, and separate document libraries for CMS and IV&V Review, organized for each milestone review. The State and Vendor Work libraries folder structure includes draft reviews, revisions, and final approval of Appendix B artifacts and checklists; an Evidence folder to support hyperlinks in the documents and checklists; and a Milestone Review folder for planning the review and for revisions to any artifacts and checklists. IV&V team members also have access to these document libraries. As an additional security measure, a static text statement has been placed at the top of each FX certification project sub-site page: "Important: This SharePoint site contains artifacts that may contain PHI/PII and should be treated with confidentially. Only those with authorized access have permission to view these artifacts."

Access to the CMS and IV&V Review libraries is restricted to IV&V and CMS reviewers and the State Certification Manager who uploads final documents to the appropriate library folders. CMS reviewers have access to these libraries only. For each milestone (R1, R2, and R3), the libraries contain folders for Evidence, Appendix B artifacts, and Checklists. The documents and checklists cannot be updated or changed once they are placed in these CMS and IV&V Review libraries as they must remain stable for the IV&V assessment to be completed on this version of the checklists and artifacts.

Exhibit 5-12: Certification Repository Sub-Site Structure for FX Projects, provides the folder structure of the State and Vendor Work libraries and the CMS and IV&V Review libraries.

Certification Repository Sub-Site Structure for FX Projects				
Library	Folder Level 1	Folder Level 2	Folder Level 3	Folder Level 4
Libraries: State and Vendor Work				
CMS Consults	Initial			
	ConOps			
R-1 Work	Evidence	Artifacts evidence		
		Checklists evidence		

	Appendix B Artifacts	State Goals & Objectives	Draft Review, Revise	
			Revision Review, Approval	
		MITA Concept of Operations	Draft Review, Revise	
			Revision Review, Approval	
		MITA Technical Mgt Strategy ... and remainder of artifacts		
	Checklists	Access & Delivery (core)	Iteration 1	Draft Review, Revise
				Revision Review, Approval
			Iteration 2	Draft Review, Revise
				Revision Review, Approval
			Iteration 3	Draft Review, Revise
				Revision Review, Approval
		Integration & Utility (core)	Iteration 1	Draft Review, Revise
				Revision Review, Approval
			Iteration 2	Draft Review, Revise
				Revision Review, Approval
			Iteration 3	Draft Review, Revise
				Revision Review, Approval
		DSS (module) ... and remainder of checklists		
	Milestone Review	Logistics and Agenda		
		IV&V MMIS Progress Report –review, response		
		Revised artifacts or evidence		
R-2 Work	Same structure as R-1 tailored to R-2 items			
R-3 Work	Same structure tailored to R-3 plus final certification request letter			
Libraries: CMS and IV&V Review				
R-1	Evidence	Artifacts evidence		
		Checklists evidence		

	Appendix B Artifacts	State Goals & Objectives		
		MITA Concept of Operations		
		MITA Technical Mgt Strategy ... and remainder of artifacts		
	Checklists	Access & Delivery (core) Integration & Utility (core) DSS (module) Intermediary & Interface (core) Standards & Conditions (core) Information Architecture (core) Program Integrity (module)		
R-2	Same structure as R-1			
R-3	Same structure as R-1			

Exhibit 5-12: FX Certification Repository Sub-Site Structure for FX Projects

SECTION 6 REQUIRED PROJECT ARTIFACTS AND REPORTING

Throughout the MECL for each FX module there will be various needs for tracking and reporting to ensure successful MMIS Certification. Many of the example reports in this section will need collaboration with AHCA and other vendors to finalize and implement. Several of the examples provided in this section are proposed reports that can be generated from the Certification Tracking Tool once it selected and implemented. **Exhibit 6-1 Summary for Project Artifacts and Reporting** summarizes each report, the responsible party and frequency that is reviewed in his section.

REPORT NAME	RESPONSIBLE PARTY	FREQUENCY
AHCA Certification Dashboard	▪ SEAS	▪ Weekly
AHCA CSF Report	▪ SEAS	▪ Weekly
Integrated Certification Project Schedule	▪ SEAS	▪ Quarterly
Stoplight Enterprise Certification Artifact Status	▪ SEAS	▪ Weekly
MITA Maturity Level Tracking	▪ SEAS	▪ After each Update

Exhibit 6-1: Summary of Project Artifacts and Reporting

6.1 AHCA CERTIFICATION TRACKING AND REPORTING

Exhibit 6-2 AHCA Certification Dashboard provides a high-level view of the overall Certification status.

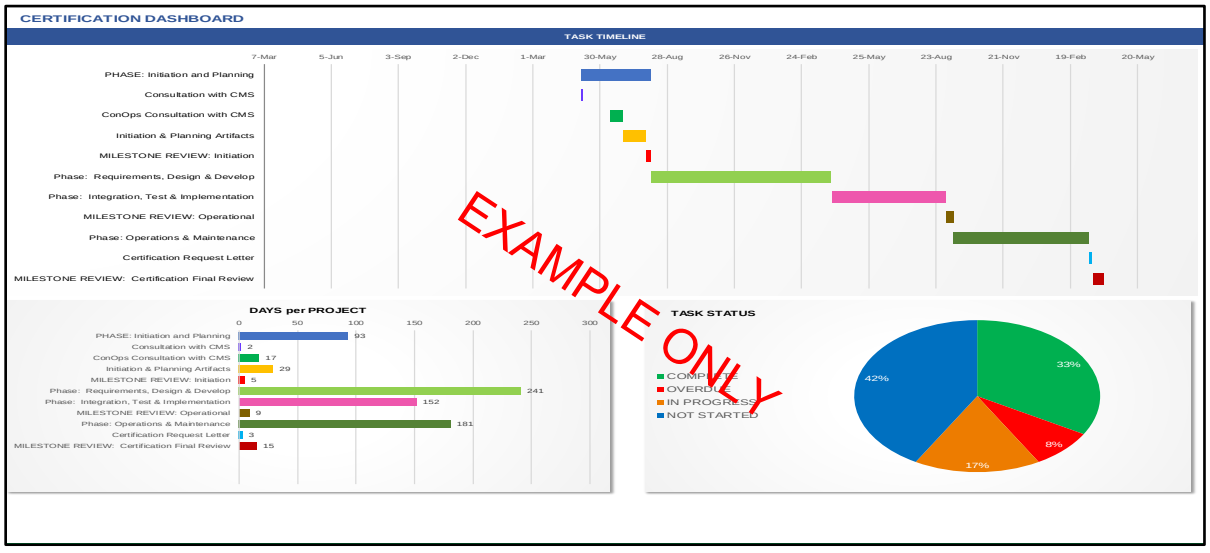


Exhibit 6-2: AHCA Certification Dashboard

Exhibit 6-3 AHCA Critical Success Factors (CSF) provides the status on open issues and pending actions. It provides a way to track critical success factors by providing a visual to track

the progress pending actions, overdue actions, and open issues. This report will be used in conjunction with the MMIS IV&V Quarterly Status Report that is sent to CMS, AHCA, and AST by the IV&V vendor.

Exhibit 6-3: AHCA Critical Success Factors (CSF) Report

Exhibit 6-4: AHCA Current Phase Checklist and CSF Analysis Report provides a way to track the number of critical success factors that are met, not met, and in process by the mapping of requirements and supporting evidence to the MECT criteria. Data from the IV&V's MMIS IV&V Quarterly Report also supports the reporting of these metrics.

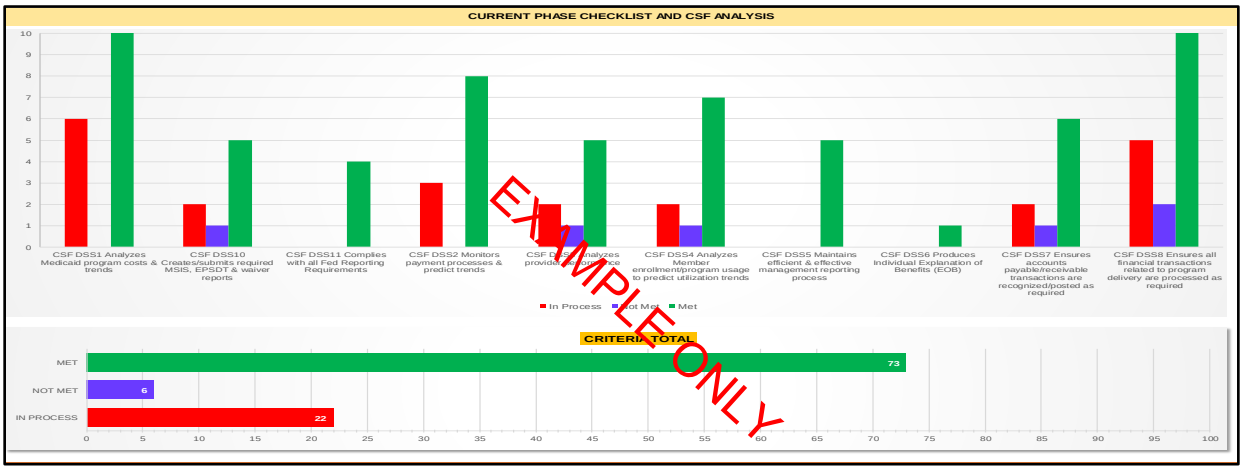


Exhibit 6-4: AHCA Current Phase Checklist and CSF Analysis Report

6.2 SEAS VENDOR TRACKING AND REPORTING

6.2.1 CERTIFICATION RELATED RISK, ISSUE ACTION ITEM AND DECISION TRACKING

Throughout the MECL, it is critical to track any related Risk, Issues, Action Items, and Decisions related to the project. It is equally as critical to be able to track it for Certification. The SEAS vendor uses the AHCA methods documented in Section 6 and 8 of the P-2 FX Project Management Standards to manage and track risks, issues, action items, and decisions for Certification.

Certification related risks, issues, action items and decisions will be visible to all project stakeholders and will help to ensure that items will be escalated when necessary. This will be critical especially for producing CMS Status Reports, deciding when to schedule milestone reviews with CMS or when AHCA must respond to follow up requests from the CMS Certification Review Team after milestone reviews.

Action items that come out of the milestone reviews will be logged and managed in a separate action log due as described in **Section 4.5.3 Execution** due to the quick turnaround time, they will be entered into the global list after the milestone review is complete. Any open items will be logged and tracked in the global list. Depending on the criticality it can also be elevated to a risk as described in the P-2 FX Project Management Standards.

The Certification Workgroup tasks will not be logged globally as action items unless they are not acted upon within a reasonable amount of time or due to unresponsiveness. If this occurs, they will be elevated to the global list to get visibility and closure. If not addressed as an action item, it will be escalated to a risk as described in the SEAS Management Plan.

6.2.2 INTEGRATED CERTIFICATION PROJECT SCHEDULE

The SEAS vendor is responsible for managing the integrated schedule. This includes monitoring all Certification schedules that are developed by all FX vendors including AHCA and SEAS owned MMIS Certification activities and tasks throughout the MECL of each FX solution beginning with the EDW. Tasks will need to be detailed to the level necessary to track MMIS Certification progress of each artifact, checklist, and evidence collection. It is imperative for all FX Vendors to collaborate to develop a detailed schedule to allow AHCA to be able to track MMIS Certification progress.

With the large number of artifacts required for the three milestone reviews, it is critical that the SEAS vendor and AHCA have a way to track who is responsible for the development of artifacts, checklist, evidence identification, and collection in addition to the numerous other tasks associated with planning for the execution of the milestone reviews with CMS. This will be a critical area that will help achieve these monitoring goals especially when more than one FX module is in development at the same time. Understanding and knowing the progress being made toward the development, and the completion of various required milestone reviews also helps to track contractual requirements and overall MMIS Certification readiness.

6.2.3 STOP LIGHT REPORTS

Artifact Number	Document/ Artifact	Responsible Party(ies) for Artifact Development	Action from Solution Vendor Complete	Action from AHCA Complete	Action from SEAS Complete	Action from IV&V Complete	Ready For CMS/MITRE Review
0	Project Partnership Understanding	AHCA	G-√	G-√	G-√	G-√	G-√
0	Checklists	AHCA, SEAS, , IVV, Solution Vendor	G-√	G-√	G-√	G-√	G-√
0	Checklist Evidence	AHCA, SEAS, IVV, Solution Vendor	G-√	G-√	G-√	G-√	G-√
6	MMIS Concept of Operations	AHCA, SEAS, IVV, Solution Vendor	G-√	G-√	G-√	G-√	G-√
8	State Security Policies/Security Plan	AHCA, Solution Vendor	G-√	G-√	G-√	G-√	G-√
9	Privacy Impact Analysis	DXC, Medicaid Program and PMO	G-√	G-√	G-√	G-√	G-√
11	Project Management Plan	Solution Vendor	G-√	G-√	G-√	G-√	G-√

Exhibit 6-5: Stoplight Enterprise Certification Artifact Status

Stoplight reports are a quick and easy way to communicate status of artifact collection at an enterprise level. This report will be included in the weekly status reports. This information that contains high-level information helps AHCA identify potential delays in the schedule. The Source Pulse Certification tool procured by the Agency will track certification activities and notify appropriate staff when an activity is complete. The tool includes dashboards to reflect the status and the progress of work tasks related to certification artifacts. The SEAS vendor shall work with AHCA and Source Pulse to refine reports like the one illustrated in **Exhibit 6-5: Stoplight Enterprise Certification Artifact Status**.

6.2.4 MITA MATURITY MONITORING FOR FX MODULES

Each FX solution is monitored closely to understand the changes that will result in MITA Maturity to the Medicaid enterprise. Monitoring the advancements throughout the MECL helps with updating the MITA SS-A, which is a required artifact during the R1- Project Initiation Milestone Review and then again for the R3-MMIS Certification Final Review. Monitoring MITA maturity is accomplished by tracking the solution vendor's adherence to requirements that evolved from the 2019 or most current MITA SS-A. There are also Certification criteria that are tied to the MITA SS-A which help track the evolution from one milestone review to the next.

Once the FX solution is implemented the SEAS vendor is responsible for updating the MITA SS-A. The timing for the MITA SS-A update occurs after implementation and before the R3-MMIS Certification Final Review so that it can be finalized and included in the R3 required artifacts when they are delivered to CMS. The updated SS-A must be completed with sufficient time to ensure that the MITA related Certification criteria on the checklists can also reflect the updates.

AHCA and the SEAS vendor conducted market research which included demonstrations from select vendors of their nonproprietary tracking tools. Each tool was evaluated and ranked using specific criteria. AHCA is currently in the process of contracting with the vendor. Once the nonproprietary MITA tracking tool is selected and implemented it will have the functionality to automatically pull reports of the data collected during the SS-A before and after the implementation of each FX module. **Exhibit 6-6: MITA Maturity Level Tracking** is a sample report that can be developed using the SS-A data. This example is for the Operations Management MITA Business Area which illustrates the maturity level changes over three SS-As conducted over the course of six years. In this example, four processes in the Operations Management MITA business area advanced.

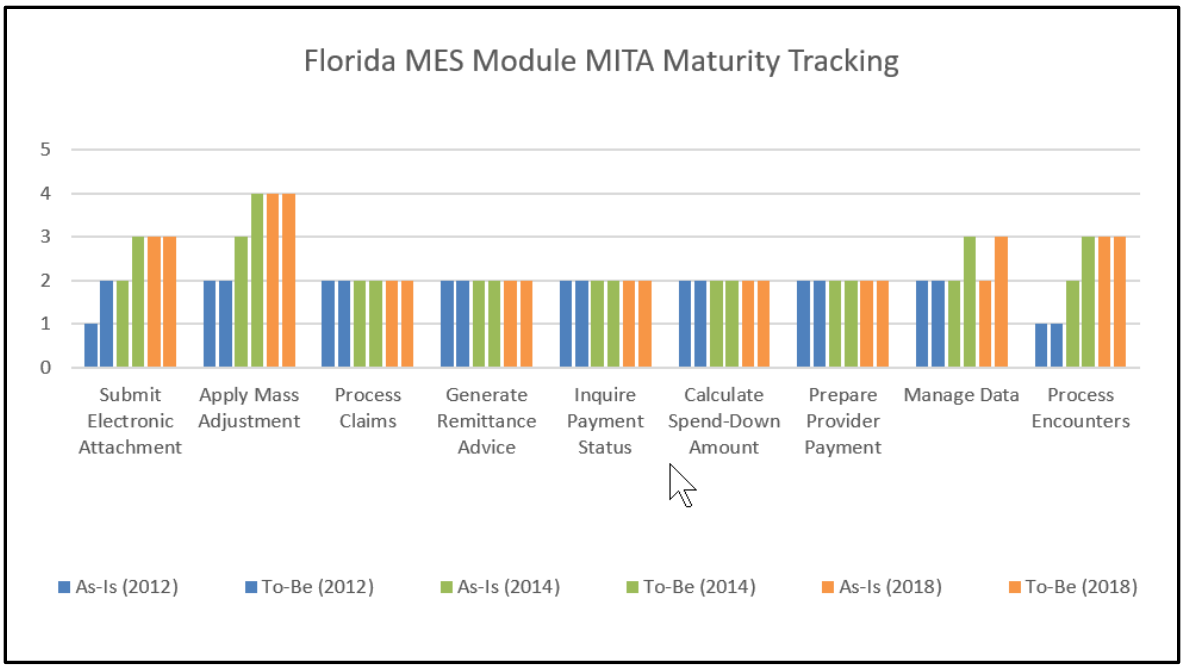


Exhibit 6-6: MITA Maturity Level Tracking

6.2.5 LEVERAGING AND REUSING ARTIFACTS

There are several artifacts required for each milestone review, and many of these build upon each other and are further developed throughout the MECL depending on IV&V recommendations or follow up requested by the CMS Certification Review Team after each milestone review.

Exhibit 6-7: Certification Milestone Review Required Artifacts Matrix provides the following detailed information about:

- Required artifacts/documents
- Owner responsible for developing the artifact

- Minimum required contents per the MECT
- Associated deliverable number or task order, if known
- Columns for R1, R2, and R3 denoting by ‘X’ if the artifact is required for the review
- Yes/no indicator if the artifact/document can be reused from one milestone to the next during the same MECL
- Yes/no indicator if it can be used for another FX Module Certification in the future
- A column indicating any tools or templates provided by CMS in the MECT to help develop the artifact, or other known resources for owners to obtain additional guidance.

Once the artifacts that can be reused are developed, many will not need to be completely re-written but rather updated for future modules.

Artifact/ Document	Owner(s)	Minimum Required Content	Deliverable	R1	R2	R3	Reusable for Same Module Certification	Reusable for Other Planned Module Certifications	MECT Tool, Template or other Resources to Help with Development
Checklists	AHCA, SEAS, IV&V	▪ Certification Criteria being sought for MMIS Certification ▪ Evidence ▪ IV&V Comment and Review ▪ MITA or MMIS Module Checklists ▪ Five Core Checklists	TBD	X	X	X	Yes	No	Yes
State goals and objectives	SEAS	▪ State goals and objectives	S-3	X			Yes	Yes	▪ CMS MES Reuse Library
MITA ConOps	SEAS	▪ Medicaid enterprise scope ▪ As-is operations (business, architecture, data) ▪ Drivers and enablers for transformation ▪ Environment (business, architecture, data) ▪ Operational scenarios ▪ Impacts on stakeholders ▪ Summary of improvements ▪ Conditions of modularity and reuse and how to meet	S-3	X		X	Yes If updated within the last year	Yes If updated within the last year	▪ MITA 3.0 Framework Pat I ▪ MITA 3.0 SS-A Companion Guide ▪ MITA Conditions and Standards Guide ▪ CMS MES Reuse Library

Artifact/ Document	Owner(s)	Minimum Required Content	Deliverable	R1	R2	R3	Reusable for Same Module Certification	Reusable for Other Planned Module Certifications	MECT Tool, Template or other Resources to Help with Development
MITA Technical Management Strategy	SEAS	▪ Document technical needs for sharing of State Medicaid Agency (SMA) services and information. See MITA, Part 3.	T-4	X (only if using waterfall SDLC)		X (only if using agile SDLC)	Yes If updated within the last year	Yes If updated within the last year	▪ MITA 3.0 Framework Part III ▪ MITA 3.0 SS-A Companion Guide ▪ MITA Conditions and Standards Guide ▪ CMS MES Reuse Library
MITA Data Management Strategy	SEAS	▪ Document technical needs for sharing of SMA services and information. See MITA, Part 2.	T-1	X (only if using waterfall SDLC)		X (only if using agile SDLC)	Yes If updated within the last year	Yes If updated within the last year	▪ MITA 3.0 Framework PART II ▪ MITA 3.0 SS-A Companion Guide ▪ MITA Conditions and Standards Guide ▪ CMS MES Reuse Library

Artifact/ Document	Owner(s)	Minimum Required Content	Deliverable	R1	R2	R3	Reusable for Same Module Certification	Reusable for Other Planned Module Certifications	MECT Tool, Template or other Resources to Help with Development
MITA State Self-Assessment (SS-A) and MITA Roadmap	SEAS	▪ As-is state ▪ To-be state ▪ Long-term milestones specified in quarters	P-1, S-3, T2 and T5	X		X	Yes If updated within the last year	Yes If updated within the last year	▪ MECT Appendix-F ▪ MITA 3.0 Framework Part I, II and III ▪ MITA 3.0 SS-A Companion Guide ▪ MITA Conditions and Standards Guide ▪ CMS MES Reuse Library
MMIS ConOps	SEAS	▪ A narrative description of each identified MMIS component, including basic functions and the business area supported ▪ A statement of security/interface and disaster recovery requirements	TBD	X		X	Yes If part of the Original Strategy	Yes If part of the Original Strategy	▪ MECT-Appendix E ▪ CMS MES Reuse Library
IAPD	SEAS	▪ Requirements analysis ▪ Feasibility study ▪ Alternatives analysis, including use of service-oriented architecture and transfer of an existing system or an explanation of why such a transfer is not feasible ▪ Cost allocation plan/methodology ▪ Proposed budget ▪ MITA SS-A, as an attachment ▪ Customized Medicaid Enterprise Certification checklists, if applicable	TBD	X		X	Yes	No	▪ 45 CFR § 95.610 ▪ CMS MES Reuse Library
State Security Policies/ Security Plan	AHCA SEAS	▪ Strategies and state policies for handling privacy, security, and HIPPA compliance. These are overarching policies that the state should have in place even before the MMIS project begins.	T-8	X	X	X	Yes	State Only	No

Artifact/ Document	Owner(s)	Minimum Required Content	Deliverable	R1	R2	R3	Reusable for Same Module Certification	Reusable for Other Planned Module Certifications	MECT Tool, Template or other Resources to Help with Development
Privacy Impact Analysis (PIA)	AHCA	▪ Use of personally identifiable information (PII) or personal health information (PHI) and a description of the types of data that will be collected ▪ Sources of PII/PHI, populations, and transfer and disclosure mechanisms ▪ Legal environment (legal authorities and state privacy laws) ▪ Details about the entities with which the collected information will be shared ▪ Privacy and security standards for its business partners and other third parties and the agreements that bind these entities ▪ Incident handling procedures ▪ Privacy and/or security awareness programs and materials for its workforce	TBD	X	X	X	Yes	Yes	▪ https://www.hhs.gov/pia/index.html
New Medicare Card Program (NMCP) State Medicaid Agency Readiness Report	AHCA	▪ Latest copy of the NMCP State Readiness Report	TBD	X	X	X	Yes	Yes	▪ https://www.cms.gov/Medicare/New-Medicare-Card/NMC-FAQs-5-18.pdf
Draft ITN (EDW, Provider)	SEAS	▪ Defined goals and objectives ▪ To-be environment requirements (business, architecture, data), including reuse, interoperability, and modularity requirements ▪ Requirements found within the Medicaid Enterprise Certification checklists ▪ The following are highly recommended, if they are legally enforceable per state law: ▪ Conditions tying compensation to meeting or exceeding defined goals (e.g., service level agreements) ▪ Reservation of right for state to approve and/or remove subcontractors ▪ Requirement that contractors cooperate with other contractors (including IV&V vendor) and not impede progress on project as a whole ▪ Performance clauses	TBD	X			Yes	Only Standard Language	▪ MECT-Appendix I ▪ CMS MES Reuse Library

Artifact/ Document	Owner(s)	Minimum Required Content	Deliverable	R1	R2	R3	Reusable for Same Module Certification	Reusable for Other Planned Module Certifications	MECT Tool, Template or other Resources to Help with Development
Project Management Plan (PMP)	SEAS, Solution Vendors	▪ Modularity plans ▪ Reuse plans ▪ Procurements plans ▪ Plans to ensure quality ▪ Plan for managing communications and stakeholders ▪ System development life cycle (SDLC)	P-2	X	X		Yes	SEAS Only	No
Schedule/ Milestones & Burn-down Charts	SEAS, Solution Vendors	▪ High-level planning schedule (specified in quarters or months, depending on project length—no specific dates necessary until detailed system requirements are defined)—waterfall or agile	P-3	X	X		No	No	No
Risk Register/ Exception Plan *	SEAS	▪ In agile, risks may be captured in an Exception Plan ▪ List of project risks and mitigation plans for each	P-3	X	X		No	No	▪ CMS MES Reuse Library
Test Plan	AHCA, Solution Vendors, SEAS	For waterfall and agile: ▪ Testing strategy (unit testing, functional testing, regression testing, integration testing, user acceptance testing, performance testing, manual and automated and/or scripted testing, disaster recovery and end-to-end integration testing of COTS products, if any) ▪ Bi-directional traceability to requirements and design ▪ Plans for preparing the test/staging environment ▪ Test cases are added as design progresses Testing should be as automated and self-documenting as possible (e.g., continuous unit testing)	TBD		X		Yes	No	No
Working MMIS module(s)	Solution Vendors	▪ Demonstrations of working software	TBD		X	X	No	No	No
Incident Management Plan	Solution Vendors	▪ What constitutes an incident, incident classifications, severity levels, and target times for resolution ▪ Processes for reporting, logging, managing, and tracking incidents to resolution and closure ▪ Process for communicating with affected stakeholders ▪ Identification of an incident manager	TBD		X	X	Yes	Yes, if there is an Enterprise one	No

Artifact/ Document	Owner(s)	Minimum Required Content	Deliverable	R1	R2	R3	Reusable for Same Module Certification	Reusable for Other Planned Module Certifications	MECT Tool, Template or other Resources to Help with Development
Change Management Plan	SEAS	▪ Identification of a change control board along with primary and backup members assigned ▪ Categorization of change types (e.g., standard, emergency, etc.) ▪ Processes for requesting, tracking, and performing impact analyses for each change request ▪ Processes for deciding whether to approve changes and for verifying that changes were made correctly	P-3		X	X	Yes	Yes	▪ CMS MES Reuse Library
Database Design	Solution Vendors	▪ A record layout of each data store with data element definitions ▪ Samples of logical data model, corresponding physical model data structures with data dictionary excerpts for each structure	TBD		X	X	Yes	No	No
Data Conversion/ Management Plan	Solution Vendors	▪ Elaboration of material in the MITA Data Management Strategy	TBD		X	X	Yes	No	No
Business Continuity/ Contingency/ Recovery Plans	Solution Vendors	▪ Backup site/failover plan ▪ Testing schedule ▪ Business continuity plans (can be a separate document)	TBD		X	X	Yes	Yes if there is an Enterprise one	No
Test Reports/ Validated Product Reports	AHCA, Solution Vendors	▪ Acceptance testing report for each user story/use case	TBD		X	X	No	No	No
System Design Document (SDD)	Solution Vendors	An SDD is not necessary for COTS products, but an interface design document (including APIs) is required. The document should include: ▪ A list of all local and off-site facilities ▪ A network schematic showing all network components and technical security controls ▪ Interface control documents ▪ A description of each component, including basic functions and the business areas supported ▪ Enterprise system diagrams, including all components, identifying all logic flow, data flow, systems functions, and their associated data storage ▪ A bi-directional traceability to requirements and test plan	TBD		X	X	Yes	No	No

Artifact/ Document	Owner(s)	Minimum Required Content	Deliverable	R1	R2	R3	Reusable for Same Module Certification	Reusable for Other Planned Module Certifications	MECT Tool, Template or other Resources to Help with Development
System Requirement Document/ Backlog of User Stories or Use Cases	AHCA, Solution Vendors	Requirements/user stories and/or use cases for functional and non-functional requirements: ▪ Business ▪ Data ▪ Capacity/performance ▪ Security/privacy/HIPAA compliance ▪ Usability ▪ Maintainability ▪ Interface ▪ 508 compliance ▪ Disaster recovery ▪ Traceability to test plans or test cases	TBD		X	X	Yes	No	No
Product Documentation	AHCA, Solution Vendors	▪ Operations manuals ▪ Training materials ▪ User guides ▪ List of all error codes and explanations by MMIS component	TBD		X	X	Yes	No	No
Roll Out Plan	Solution Vendors	▪ Plan for rolling out the new or updated module/system to the users	TBD		X		N/A	No	No
HIPAA Statement	AHCA	▪ A statement that the system meets HIPAA requirements for transactions and code sets, privacy and security, and when required, National Provider Identifier. This statement is in addition to the completion of all the HIPAA-related checklist criteria.	N/A		X	X	Yes	Yes	No

Artifact/ Document	Owner(s)	Minimum Required Content	Deliverable	R1	R2	R3	Reusable for Same Module Certification	Reusable for Other Planned Module Certifications	MECT Tool, Template or other Resources to Help with Development
Official Certification Request Letter	AHCA	▪ The date the system became fully operational ▪ A copy of the state's letter to the MMIS contractor or state development team accepting the system/modules(s) ▪ A copy of the official acceptance letter from the state to the MMIS contractor or state development team ▪ A proposed timeframe for the review ▪ A declaration that the state's MMIS meets all the requirements of law and regulation: › Meets the requirements of 42 CFR 433.117 for all periods for which the 75 % FFP is being claimed › Issues Explanation of Benefits (EOBs) on a regular basis for all periods for which 75-percent FFP is being claimed, in accordance with the provisions of Section 10 of P.L. 95142, which amends section 1903(a)(3) of the Social Security Act › Is ready for MMIS Certification, based on the state's evaluation using the checklists in the Toolkit › Adjudicates claims and information required for payment of services in accordance with all provisions of 42 CFR 447 and the approved state Medicaid plan › Generates up-to-date and accurate Transformed Medicaid Statistical Information System (T-MSIS) data › Routinely generates backups containing up-to-date and accurate T-MSIS data › Exercises appropriate privacy and security controls over the system in accordance with 45 CFR Part 164, P.L. 104-191, HIPAA of 1996, and 1902(a)(7) of the Social Security Act as further interpreted in regulations at 42 CFR 431.300 to 307	N/A			X	N/A	Yes	▪ MECT-Appendix J

Artifact/ Document	Owner(s)	Minimum Required Content	Deliverable	R1	R2	R3	Reusable for Same Module Certification	Reusable for Other Planned Module Certifications	MECT Tool, Template or other Resources to Help with Development
Production Screenshots, Reports, and Data	AHCA, Solution Vendors	▪ A sample of production data ▪ A substantive and representative set of all reports and information retrieval screens (electronic format preferred) ▪ A list of information retrieval functions and reports for each business area (including a list that identifies the distribution of the reports and who can access the information retrieval displays) ▪ The evidence that T-MSIS data requirements have been met for timeliness and data quality ▪ The samples from six months of operating data	TBD			X	N/A	No	No

Exhibit 6-7: Certification Milestone Review Required Artifacts Matrix

SECTION 7 UPDATES AND IMPACT ANALYSIS

7.1 MECL AND MECT UPDATE PROCESS

AHCA and the SEAS vendor are responsible for monitoring federal publications, notices, and websites for Medicaid Certification guidance and MECT updates. Should there be any updates throughout the life of the FX project, the SEAS vendor analyzes the information and conducts a gap analysis of the change impacts.

There are occasions when the changes have little to no impact and other times when there are large impacts that may require changes in vendor scope and request for additional federal funding. Once the gap analysis is completed the SEAS vendor prepares a MMIS Certification Analysis Summary document and delivers it to AHCA who is responsible for reviewing the analysis and providing feedback to the SEAS vendor. In addition to providing the SEAS vendor with feedback, AHCA is also responsible for assessing if any changes to the Certification Training Curriculum are warranted.

Once the SEAS vendor receives feedback from AHCA, the SEAS vendor is responsible for assessing Certification tasks, scope changes, and potential changes for other vendors and tools that support Certification and present the recommendations to AHCA for action. When a decision is made on the change by AHCA, the SEAS vendor follows the AHCA approved SEAS Change Control Procedures and Decision Logging process outlined in Section 8 of the P-2 FX Project Management Standards Deliverable. AHCA works with the SEAS, IV&V and FX solution vendors to distribute any updates and communicate outcomes to all stakeholders.

APPENDICES

APPENDIX A – FX CERTIFICATION EVIDENCE TEMPLATE

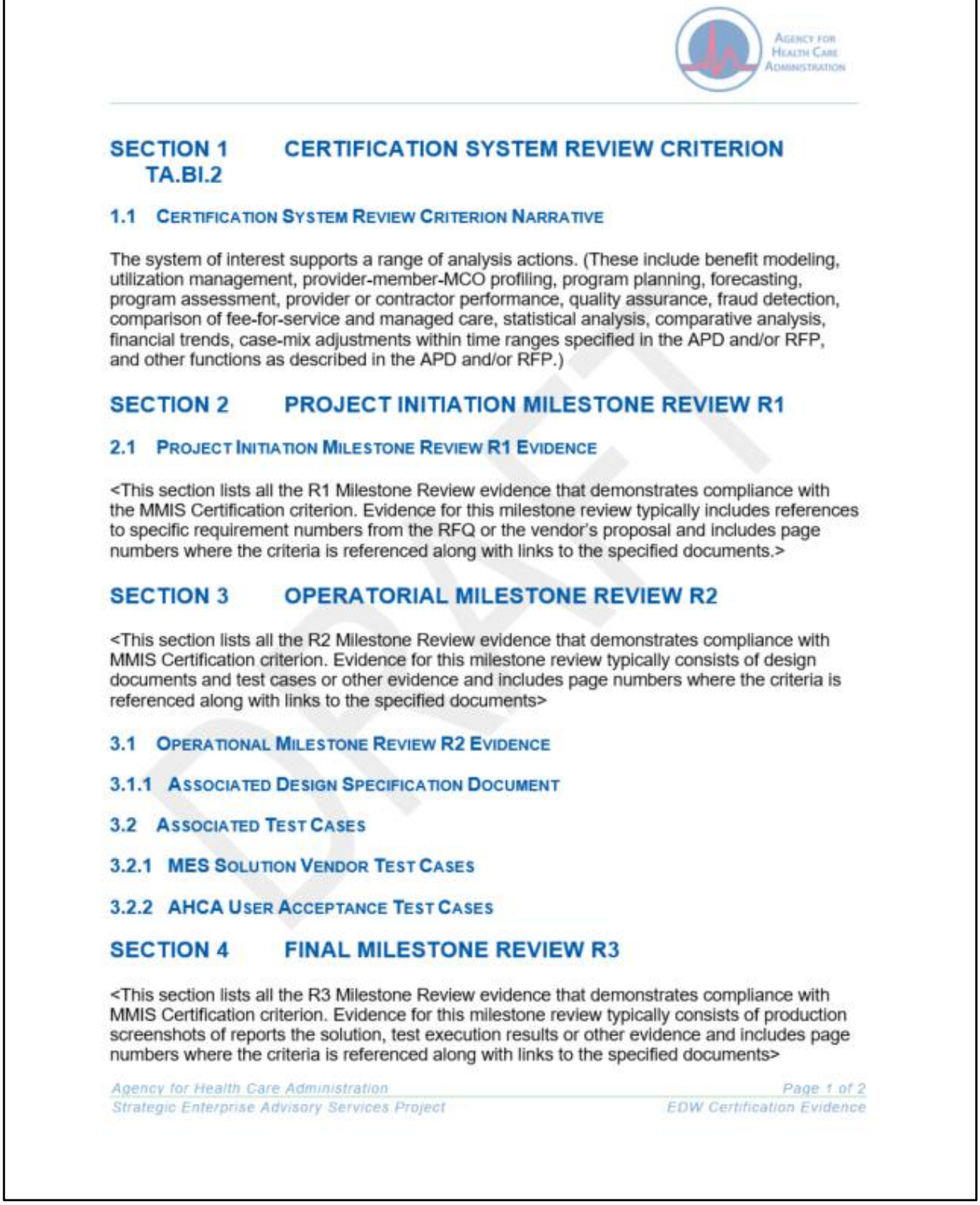
Revision History

DATE	VERSION	DESCRIPTION	AUTHOR
11/1/2018	1.0	EDW Certification Evidence TA.BI.2 Development Draft Version1.0	Vivian de la Gandara

Modifications to the approved baseline version (100) of this artifact must be made in accordance with the Change Control process that is part of the Scope Management Plan.

Quality Review History

DATE	REVIEWER	COMMENTS



AGENCY FOR HEALTH CARE ADMINISTRATION

SECTION 1 CERTIFICATION SYSTEM REVIEW CRITERION TA.BI.2

1.1 CERTIFICATION SYSTEM REVIEW CRITERION NARRATIVE

The system of interest supports a range of analysis actions. (These include benefit modeling, utilization management, provider-member-MCO profiling, program planning, forecasting, program assessment, provider or contractor performance, quality assurance, fraud detection, comparison of fee-for-service and managed care, statistical analysis, comparative analysis, financial trends, case-mix adjustments within time ranges specified in the APD and/or RFP, and other functions as described in the APD and/or RFP.)

SECTION 2 PROJECT INITIATION MILESTONE REVIEW R1

2.1 PROJECT INITIATION MILESTONE REVIEW R1 EVIDENCE

<This section lists all the R1 Milestone Review evidence that demonstrates compliance with the MMIS Certification criterion. Evidence for this milestone review typically includes references to specific requirement numbers from the RFQ or the vendor's proposal and includes page numbers where the criteria is referenced along with links to the specified documents.>

SECTION 3 OPERATORIAL MILESTONE REVIEW R2

<This section lists all the R2 Milestone Review evidence that demonstrates compliance with MMIS Certification criterion. Evidence for this milestone review typically consists of design documents and test cases or other evidence and includes page numbers where the criteria is referenced along with links to the specified documents>

3.1 OPERATIONAL MILESTONE REVIEW R2 EVIDENCE

3.1.1 ASSOCIATED DESIGN SPECIFICATION DOCUMENT

3.2 ASSOCIATED TEST CASES

3.2.1 MES SOLUTION VENDOR TEST CASES

3.2.2 AHCA USER ACCEPTANCE TEST CASES

SECTION 4 FINAL MILESTONE REVIEW R3

<This section lists all the R3 Milestone Review evidence that demonstrates compliance with MMIS Certification criterion. Evidence for this milestone review typically consists of production screenshots of reports the solution, test execution results or other evidence and includes page numbers where the criteria is referenced along with links to the specified documents>

AGENCY FOR HEALTH CARE ADMINISTRATION

4.1 FINAL MILESTONE REVIEW R3 EVIDENCE

4.1.1 REPORT

4.1.2 SCREEN

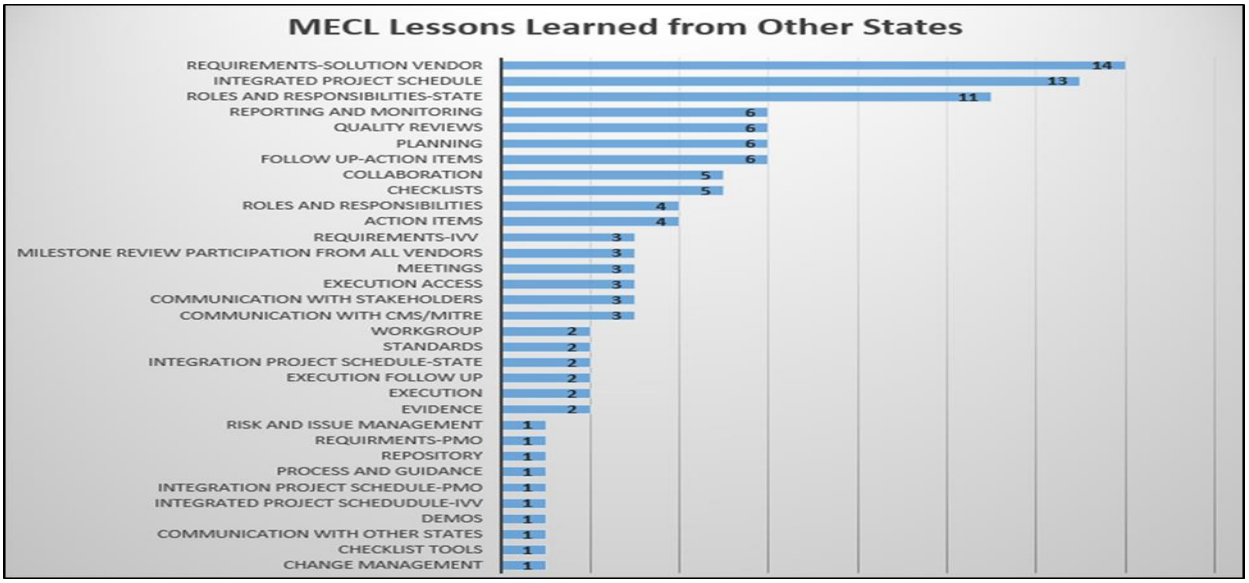
4.1.3 PROCEDURE MANUALS

APPENDIX B – RECOMMENDATIONS, LESSONS LEARNED, AND BEST PRACTICES

Since the MECL process has been out only since 2016 and updated in 2018, not many states have been through all three milestone reviews to certify their solutions using the new review process. This section is focused mainly on experiences from other states who have recently certified their solutions using the MECL, or projects that are currently in flight and team members have personal experiences that could be helpful to AHCA as it moves forward with its procurement strategy and MMIS Certification planning efforts.

The referenced states have also been contributors to content on the Medicaid CMS Enterprise Systems Reuse Repository and have presented at the Medicaid Enterprise Systems Conference (MESC) this past year. These states are open to share their experiences with other states to assist them with planning and preparing for their MMIS Certification tasks as they move forward with replacing their MMIS solutions. States that have provided these additional lessons learned include the State of Montana who successfully certified their Pharmacy Benefits Manager Module and Nevada who is in the process of modernizing its MMIS solution.

AHCA is also quite familiar with the effort taking place in Puerto Rico since it is installing the current FMMIS solution that Florida is seeking to replace. Though Puerto Rico is unique and in the process of installing its first MMIS/ DSS, it is still subject to meeting MMIS Certification requirements and is currently in the process of working with the CMS Certification Review Team to carry out an R2-Operational Milestone Review. Lessons learned from that project are included in this section along with observations from Vermont, Montana, and New Mexico. After reviewing and analyzing the various lessons learned data gathered for developing this section, the recommendations were grouped to understand the highest areas of concerns from the states.



REQUIREMENTS

Though ultimately all states acknowledged they owned the Certification process and the ultimate responsibility for Certification of their MMIS solutions, they also had strong recommendations around requirements. All states stressed the importance of having strong and clear requirements from the beginning to ensure all vendors supporting the project were clear on their responsibilities related to MMIS Certification. They offered suggestions for areas where states should consider developing Certification requirements including:

- Key Personnel
  - Dedicated Certification Resource
- Deliverables
  - Certification Plan
  - Artifacts
  - Readiness Reports
- Certification Support throughout the entire MECL
  - Clear Roles and Responsibilities
    - Producing Evidence
    - Updating the Library
    - Assist in planning and execution of milestone reviews
      - Participate in Certification Workgroups
      - Developing presentations
      - Helping the state respond to CMS requests and questions
- Service Level Agreements (SLA)
  - Sanctions for Vendor contributing to not achieving MMIS Certification
  - Sanctions for delays in any Certification related deliverables
- Working with the IV&V Vendor
- Certification Reporting and Tracking
  - Certification Project Schedule
  - Frequency of Reporting

INTEGRATED MMIS CERTIFICATION PROJECT SCHEDULE

All states had similar views regarding the necessity for a detailed MMIS Certification integrated schedule so that the state could understand the true readiness to undergo each of the three milestone reviews. They also recommended making sure to track every artifact including checklists allowing sufficient time

for joint reviews to ensure completion prior to passing it to the IV&V vendor for their review. There were many variations on who they felt should manage the schedule including the State itself, the PMO, or IV&V vendors. Other recommendations related to the integrated Certification Schedule include:

- Identify and assign responsibilities
- Treat the Certification effort like a sub-project of your system implementation effort
- Plan the activities and establish timelines
- Work with the IV&V vendor to ensure there is sufficient time in the schedule for their review
- Include checklists, artifacts and evidence collection/development tasks in the schedule
- Incorporate quality reviews of the checklists, artifacts and evidence
- Monitor the status of each task through completion

ROLES AND RESPONSIBILITIES

The roles and responsibilities were another area with several lessons learned. States agree on the need for all its vendors supporting the IT project to have clear expectations on roles and responsibilities. They also agreed that to be successful, vendors' roles and responsibilities need to be defined using strong contract language, in addition to the RFP requirements and negotiated in subsequent contracts.

Many of the states mentioned that Certification projects should ensure that the state and all vendors have a designated Certification Lead/Manager who is responsible for communicating Certification information to their designated organizations.

STAKEHOLDER COMMUNICATION

It is imperative that all stakeholders from the very top to bottom of the FX project understand the critical dependency MMIS Certification has on this project. It is also necessary for them to fully understand the MECL and individual roles and responsibilities they have in the process. Targeted communication in addition to training is imperative to successful MMIS Certification.

COMMUNICATION WITH CMS SOT AND THE CMS CERTIFICATION REVIEW TEAM

If there are ever any questions about the Certification process, it is critical to ensure that the lines of communication are open with CMS. If necessary, AHCA could request that their CMS SOT coordinate a discussion with the Certification Review Team. It is good to log any questions and track the responses.

Outside of regular meetings with CMS during the development of each module, CMS also provides a CMS Certification Email where questions can be sent.

Communication with the CMS Certification Review Team increases as AHCA nears the execution of milestone reviews. AHCA is encouraged to ask and interact with the team when possible to help ensure a successful review.

MONTHLY INTERNAL CERTIFICATION STAKEHOLDER MEETING

It is imperative for AHCA to conduct and facilitate a series of meetings geared toward different stakeholders both internal to the state organization, with vendors and with CMS. A monthly Certification meeting with all vendors to review status and identify any potential risks or issues associated with MMIS Certification is recommended.

CERTIFICATION WORKGROUP

Approximately 12 weeks before each planned milestone review, a weekly Certification Workgroup meeting should be scheduled to ensure all vendors work together to plan for the execution of the milestone review and complete any assigned tasks that may result from the Certification Workgroup.

Some of the tasks that may be identified, assigned and completed as a result of the Certification Workgroup Meeting include:

- Planning Activities
  - Developing and finalizing agendas for the reviews
  - Developing presentations
  - Scheduling of space or online meetings/conference calls
  - Granting access to CMS Certification Review Team
- Quality Assurance
  - Reviewing and finalizing artifacts
  - Reviewing and finalizing mappings
  - Reviewing and finalizing checklists
  - Reviewing and finalizing evidence
- Action Item Follow Up
  - Addressing IV&V comments and recommendations
  - Addressing and resolving CMS requests

NEWSLETTER OR OTHER COMMUNICATIONS

Many states have newsletters that are published to stakeholders during the development of new IT projects. This is a unique way to communicate to stakeholders who are not typically included in the development of the project but are users of the system. Using this avenue to

include Certification related information helps educate staff on the new process and is a way to engage them and prepare them for Final Certification.

PLANNING

Early Planning and task completion are the key to success since there is a great amount of effort that goes in to developing, collecting and storing the artifacts, mapping requirements, producing the checklists and related evidence, responding to and tracking IV&V and CMS issues, and planning for and executing the milestone reviews.

COLLABORATION

Finally, collaboration and reuse are strongly encouraged since it is one of CMS goals but also to address what appears to be, based on state reported experiences, some inconsistency in how the MECL process is applied from one region to another. Reaching out to other states to find out first-hand how they deal with certain issues or circumstances can be of great benefit especially when time is of the essence. Many states are very willing to share their experiences with other states so that the same problems are not repeated. They are also willing to share examples of what they provided as evidence or artifacts required for each milestone review.

The CMS Medicaid Enterprise Systems Reuse Repository allows for states to upload and share all kinds of information in hopes that states can leverage or reuse the information. Some states do not choose this route but express to their CMS SOT their willingness to share so it is a good idea to ask the CMS SOT for suggestions on who may be able or willing to share or discuss their lessons learned or artifacts.

It is also good to let your CMS SOT know that you are willing to be a resource to other states since there may be opportunities for partnering or sharing solutions which could reduce costs for the states involved as well as the federal government States can work with the CMS SOT to determine good artifacts to share and can upload them directly to the CMS Reuse Repository instructions for uploading document can be found at the following link: https://zone.cms.gov/wiki/instructions-uploading-document-artifact-tiers-1-3-reuse-repository.

LESSONS LEARNED FROM OTHER STATES

SUBJECT	COMMENT	STATE
Action Items	Action Item log used to document follow-up questions and post responses with defined due dates	Montana
Action Items	Perform follow-up	Montana
Action Items	Provide supplemental artifacts to resolve action items	Montana
Action Items	Use Enterprise AI process to track tasks	Puerto Rico
Change Management	Unanticipated effort required contract and schedule changes	Nevada
Checklist Tools	Implement or develop a consolidated Certification Criteria Spreadsheet to track status of all Certification Criteria in one file tracker	Puerto Rico, Nevada
Checklists	Make sure the URL is used on checklists to avoid this problem	Puerto Rico
Checklists	Plan for IV&V to conduct a pre-review of all documentation for quality purposes and to avoid obvious oversights such as missing documentation that is not in the repository.	New Mexico, Puerto Rico, Montana, Vermont
Checklists	Recent changes in Microsoft Office Projects create problems with hyperlinks in checklists that trace back to a Microsoft 365 SharePoint site. Hyperlinks do not work if the reviewer does not have access to the repository or is working offline.	Puerto Rico
Checklists	Transfer all criteria to one consolidated spreadsheet to track status. Once complete, the data will be transferred to each checklist quickly.	Puerto Rico, Nevada
Checklists	Working in individual checklists is frustrating and inefficient	Puerto Rico, Nevada
Collaboration	Bring together State and Vendor staff to discuss: What is the MECT criterion asking? Does the artifact clearly demonstrate the MECT criterion? Is the most important information in tables and screenshots easy for the reviewers to locate? Will reviewers unfamiliar with the system and project be able to easily understand the artifact?	Montana
Collaboration	Artifacts updated, and final review completed	Vermont, New Mexico, Puerto Rico, Montana
Collaboration	Partner with Vendors	Puerto Rico, Nevada
Collaboration	State and Vendor meet to discuss findings	Vermont, New Mexico, Puerto Rico, Montana

Collaboration	Supporting evidence of the answer including a demonstration if possible	Montana
Communication with CMS/MITRE	CMS SOT Status Calls are helpful	Puerto Rico
Communication with CMS/MITRE	Coordinate with CMS Regional and CMS Central Office	Montana
Communication with CMS/MITRE	When the action items were closed, State PM emailed CMS and MITRE with a link to the closed item. Occasionally, Montana emailed the artifact (if it did not contain PHI or sensitive security information)	Montana
Communication with Other States	Talk to other states	Puerto Rico, Nevada
Communication with Stakeholders	Communicate the status of the Certification process to stakeholders	Montana
Communication with Stakeholders	Frequent and clear communication	Montana
Communication with Stakeholders	Throughout the project there needs to be a focus on the eventual Certification (i.e. supporting artifact and functionality demonstrations)	Montana
Demos	Practiced the live demonstrations with external entities (i.e. contracted entities like Mountain Pacific)	Montana
Evidence	Add links to other evidence to help reviewers navigate directly to the related evidence or include as much of the evidence in the evidence template	Puerto Rico, Montana
Evidence	Each system review criteria should be documented in one document template	Puerto Rico, Montana
Execution	Clear authority of who was in charge and facilitating the meeting (State PM, opened the day, closed the day, fielded questions)	Montana
Execution	Transparently present the information and the solution	Montana
Execution Access	Provide access to the artifact repository	Montana
Execution Access	Provide access to the system	Montana
Execution Access	Provide self-service access to FlexibleRx system and all artifacts and supporting materials on State's SharePoint Site	Montana
Execution Follow Up	Provide answers to questions	Montana
Execution Follow Up	Provide timely follow-up	Montana
Follow Up-Action Items	Certification Collaboration Environment Internal Task list tracking assignment and status of each artifact	Montana

Follow Up-Action Items	All AI's were due no longer than a week, but most were same day or less than 48 hours.	Montana
Follow Up-Action Items	Be available on short notice to answer questions or setup a virtual meeting	Montana
Follow Up-Action Items	Clear task assignment	Montana
Follow Up-Action Items	Maintained flexibility and responsiveness throughout the process	Montana
Follow Up-Action Items	Specific individual assigned to complete the action item	Montana
Integrated Project Schedule - IV&V	Develop the integrated plan to achieve Certification	Montana
Integrated Project Schedule	Break the work down into tasks	Montana
Integrated Project Schedule	Compile all required artifacts for the checklist items identified by the required date	Montana
Integrated Project Schedule	Develop schedule for evidence collection. Establish hard stops for evidence collection so that complete review and follow-up corrections can occur one time	Puerto Rico, Nevada
Integrated Project Schedule	Establish a schedule	Montana
Integrated Project Schedule	Established, executed, and tracked progress against the Plan	Montana
Integrated Project Schedule	Identify and assign responsibilities	Montana
Integrated Project Schedule	In the new MECL process, the IV&V vendor is responsible for reviewing and commenting on the Certification Checklists to validate if the state's evidence meets the Certification criteria prior to reporting to CMS. This process is labor intensive for the IV&V vendor just as it is for the State. If there is not sufficient time for review this may cause significant delays and could impact the planned dates for milestone review execution.	Puerto Rico
Integrated Project Schedule	It is important for the State, that the IV&V and other FX vendors include Certification tasks that are detailed enough to ensure all activity associated with milestone review preparation, execution and follow up is completed and reviewed timely by the IV&V vendor. At a minimum, develop a tracking mechanism for each artifact and checklists.	Puerto Rico, Montana
Integrated Project Schedule	Monitor tasks completion	Montana

Integrated Project Schedule	Monitor the status of each task	Montana
Integrated Project Schedule	Plan the activities and establish timelines	Montana
Integrated Project Schedule	Treat the Certification effort like a sub-project of your system implementation effort.	Montana
Integrated Project Schedule	Work with the IV&V vendor to ensure there is sufficient time in the integrated Certification schedule.	Puerto Rico
Integration Project Schedule-PMO	Develop the integrated plan/schedule to achieve Certification	Montana
Integration Project Schedule-State	Monitor the status of each task	Montana
Integration Project Schedule-State	Plan the activities and establish timelines	Montana
Meetings	Certification Meeting	Puerto Rico, Nevada
Meetings	Conduct Certification Review Meeting	Montana
Meetings	Internal Certification Meeting Status	Montana, Vermont
Milestone Review Participation from All Vendors	Have all active participants present in the room, even though CMS or /MITRE participated remotely	Montana
Milestone Review Participation from All Vendors	Assign clear speaking roles and clear assignments for follow-up questions (i.e. experts)	Montana
Milestone Review Participation from All Vendors	Ensure that qualified and knowledgeable resources are present at each meeting to provide explanations for follow-up items and respond to questions	Montana
Planning	Certification Collaboration Environment With CMS/MITRE: • Folder for each Checklist • Folder for Appendix B Artifacts	Montana
Planning	Create the formal presentation materials	Montana
Planning	Perform the logistics test with CMS a week prior to ensure that they could hear us and were able to access the WebEx.	Montana
Planning	Successfully complete dry runs and tests of logistics	Montana
Planning	Test the virtual meeting logistics (same room, same phone, same internet, etc.)	Montana
Planning	Have two full dry runs including questions from the audience	Montana
Process and Guidance	New process and inconsistent application from one state to the next	Nevada

Quality Reviews	Conduct multiple quality reviews of each artifact	Montana
Quality Reviews	Coordinate internal quality review of artifacts, evidence, and supporting documentation	Montana
Quality Reviews	Perform internal quality reviews	Montana
Quality Reviews	Quality reviews	Montana
Quality Reviews	State conducts review of every Certification artifact and provides feedback	Montana, Vermont
Quality Reviews	Vendors developed evidence documents, State PMO reviewed first then by business staff before providing to IV&V	Nevada
Reporting and Monitoring	Status reporting with metrics to track progress	Montana
Reporting and Monitoring	Communicate the status of the Certification process to stakeholders	Montana
Reporting and Monitoring	Monitor status	Puerto Rico, Nevada
Reporting and Monitoring	Track assignment of each artifact creation task	Montana
Reporting and Monitoring	Track metrics, if needed	Montana
Reporting and Monitoring	Track metrics regarding artifact development status	Montana
Repository	Establish shared repository and related documentation early	Puerto Rico, Nevada
Requirements-IV&V	Establish clear contractual responsibilities in the IV&V contract	Montana
Requirements-IV&V	Perform independent review of artifacts, evidence, and supporting documentation ownership	Montana, Puerto Rico, Vermont, New Mexico, Nevada
Requirements-IV&V	Provide dedicated resources throughout the Certification process	Montana
Requirements-Solution Vendor	Develop MECT artifacts/evidence to for assigned MECT checklist items	Montana
Requirements-Solution Vendor	Develop presentation materials for the Certification meeting	Montana
Requirements-Solution Vendor	Quickly respond to State or CMS requests for information	Montana
Requirements-Solution Vendor	Be available on short notice for internal or external meetings	Montana

Requirements-Solution Vendor	Clear requirements to support and perform Certification responsibilities	Montana
Requirements-Solution Vendor	Complete required MECT IV&V Progress Reporting	Montana
Requirements-Solution Vendor	Create and provide supporting documents, artifacts, graphics to support MECT checklist items	Montana
Requirements-Solution Vendor	Establish clear contractual responsibilities in the module vendor contract	Montana
Requirements-Solution Vendor	Participate in planning activities	Montana
Requirements-Solution Vendor	Participate in planning activities and status meetings lead by the Department	Montana
Requirements-Solution Vendor	Participate in presentation/demonstration preparation meetings	Montana
Requirements-Solution Vendor	Participate in the presentation to CMS	Montana
Requirements-Solution Vendor	Provide dedicated resources throughout the Certification process	Montana
Requirements-Solution Vendor	Include strong contract language for Certification activities	Montana
Requirements-PMO	Make a requirement for the Project Management Office and other vendors including the state to provide regular updates	Puerto Rico, Montana
Risk and Issue Management	Establish an escalation process to resolve delays and/or quality issues	Montana
Roles and Responsibilities	Assist in the review of MECT checklist items	Montana
Roles and Responsibilities	Coordinate planning activities with State Project Team	Montana
Roles and Responsibilities	Coordinate with CMS Regional and CMS Central office	Montana
Roles and Responsibilities	If roles and responsibilities are not clearly defined for all vendors, there could be challenges with tracking readiness to execute Certification milestone reviews	Puerto Rico
Roles and Responsibilities-State	Accountability	Montana
Roles and Responsibilities-State	Assign tasks to team members	Montana

Roles and Responsibilities-State	Identify resources that will support the process	Montana
Roles and Responsibilities-State	Lead all aspects of the Certification process	Montana
Roles and Responsibilities-State	Own the Certification process	Montana
Roles and Responsibilities-State	Ownership starts early (i.e. RFP development, requirements, and contract language	Montana
Roles and Responsibilities-State	The State is responsible for the overall success of the Certification process	Montana
Standards	Establish a style guide for evidence	Puerto Rico, Nevada
Standards	Use a consistent template for every artifact	Puerto Rico, Montana
Workgroup	Conduct internal Certification workgroup meetings	Nevada
Workgroup	Conduct joint workgroup meetings	Puerto Rico, Nevada