

Independent Review

Nava Public Benefit Corporation Contract 36881 Integrated
Benefits Service

For the
State of Vermont
Agency of Human Services, Department of Vermont Health
Access



**Submitted to the
State of Vermont, Agency of Digital Services
April 3, 2019**

FINAL

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1 Executive Summary

This section includes an introduction with a brief overview of the technology project and selected vendor(s), as well as any significant findings or conclusions. Significant findings or conclusions are supported by data provided later in the report.

This Independent Review was undertaken to evaluate the State's contract and amendment with Nava Public Benefit Corporation (Nava) for professional services to design, development, and implementation (DDI) an integrated benefits service for the State of Vermont's (State's) Agency of Human Services (AHS), Department of Vermont Health Access (DVHA), and Agency of Digital Services (ADS) Customer Portal Phase 1 (CPPH1) project. This Independent Review began on January 15, 2019, and the presentation of findings is scheduled for April 1, 2019.

The IT activity being reviewed through this process is different than other IT activities reviewed because it is part of an active DDI project, rather than the acquisition and implementation of a commercial off-the-shelf (COTS) or software as a service (SaaS) system.

Vermont (VT) was one of five states selected to receive technical assistance, at no cost through a philanthropic funded initiative called the Integrated Benefits Initiative, from Nava and Code for America to implement an integrated benefits service (referenced as document uploader portal in this report). The document uploader portal is one of the major components to the CPPH1 solution that will streamline the intake and processing of verification documents, reducing the unnecessary burdens with submitting verification documentation and ensuring accurate and timely eligibility determination for Vermonters in need of health coverage and financial assistance. In order for Nava (the lead in VT) to provide technical services, the State executed a one-year, sole-source, no-cost contract in August 2018.

Due to the Integrated Benefits Initiative's philanthropic funding ending on December 31, 2018, the State received approval to execute a sole-source contract amendment in order to provide funding for products and services actually delivered or performed by Nava between January 1, 2019 and August 15, 2019 not to exceed a sum of \$1,323,110.

It's important to note that this Independent Review Report was written as a point-in-time for an active design, development, and implementation (DDI) project and does not include an evaluation of the original decision to engage with Nava for the CPPH1 project or the subsequent sole-source decision.

While conducting this Independent Review, BerryDunn identified four risks that are listed in summary form in Section 1.3, and in detail in Attachment 2. The State has identified sufficient responses for each of these risks and is currently executing on those strategies.

1.1 Cost Summary

This section includes a summary of the project costs; details can be found in the body of the report.

Table 1.1: Cost Summary

IT Activity Lifecycle:	5 Years
Total Lifecycle Costs:	\$1,759,302.80
Total Implementation Costs:	\$1,484,881.88
New Annual Operating Costs:	\$160,000.00
Current Annual Operating Costs:	\$0.00
Difference Between Current and New Operating Costs:	\$160,000.00
Funding Source(s) and Percentage Breakdown of Multiple Sources:	Federal and State

1.2 Disposition of Independent Review Deliverables

This section includes a summary of the Independent Review findings as elaborated later in the report.

Table 1.2: Independent Review Deliverables

Deliverable	Highlights From the Independent Review Include Explanations of Any Significant Concerns
Acquisition Cost Assessment	<p>DVHA received procurement advisory services from the General Service Administration (18F), resulting in a contract amendment with a time and materials payment model, including an outline of deliverables tied to project phases/milestones.</p> <p>The acquisition costs assessed included only those applicable to the scope of work outlined in the Nava contract and amendment, specifically hosting, professional services for implementation, and ADS estimated Enterprise Architect (EA) and Project Oversight. These costs total \$1,484,881.88.</p>
Technology Architecture Review	<p>The proposed architecture includes an open source, web-based, public-facing document uploader portal that integrates with the State's Enterprise Content Management (ECM) and authentication solution. While most of the DDI efforts will be provided by Nava, the solution will be hosted and maintained by the State after Nava's contract ends.</p>



Deliverable	Highlights From the Independent Review Include Explanations of Any Significant Concerns
Implementation Plan Assessment	Based on interviews with the CPPH1 project team (including Nava) and our review of project documentation, Nava has been applying agile and user-centered design principles to the document uploader portal DDI efforts. Their approach aligns with the overall technical strategy and approach at the Integrated Eligibility and Enrollment (IE&E) program level and has proven to be successful.
Cost Analysis and Model for Benefit Analysis	The firm believes that the new operational cost will benefit the State; however, it is not clear how much state labor will be reduced and when. It is our understanding that the CPPH1 project team will continue to monitor key metrics to ensure those benefits are realized as the CPPH1 capabilities are rolled out to AHS's benefiting healthcare and financial assistance programs.
Impact Analysis on Net Operating Costs	The anticipated impact on net operating costs were negligible. However, the IT ABC form and our cost assessment reflects a cost model that increases the current annual operational costs by \$160,000. These costs were anticipated by the State and the appropriate technical resources for application maintenance will be allocated accordingly.

1.3 Identified High Impact and/or High Likelihood of Occurrence Risks

This section includes a summary of high impact and high likelihood risks as identified in the body of the report.

As a result of this Independent Review, BerryDunn identified four risks. One risk has a high impact should it occur, as well as a high probability of occurring if the mitigation strategy is not employed or is not effective.

Table 1.3, below, provides a summary of each risk, including risk probability, impact, and overall rating. A complete Risk Register, detailing all four risks, is included in Attachment 2.

Table 1.3: Project Risk Summaries and Ratings

Risk ID	Risk Description	Risk Likelihood/Probability:	Risk Impact:	Overall Risk Rating:
1	There is risk to the project scope and schedule due to dependencies on system readiness of the State's enterprise content management system (OnBase).	Medium	High	High
2	There is a risk to the project scope and schedule related to unfulfilled requirements by the State due to a technical resource limitations.	Medium	Medium	Medium
3	There is risk to the project scope and schedule due to dependencies on system readiness of the State's authentication solution.	Low	Low	Low
4	There is a financial risk to due to the State receiving conditional approval from the United States Department of Agriculture, Food, and Nutrition Service (FNS) for approximately 16% of design, development, and implementation costs.	Low	Low	Low

1.4 Other Key Issues

This section includes a brief summary of any key issues or concerns identified in the body of the report.

The contract and amendment between the State and Nava has already been executed. Therefore, this Independent Review Report is a point-in-time document that reflects current key issues and concerns, which are identified throughout this report under relevant headings.

1.5 Recommendation

This section provides the Independent Review recommendation on whether or not to proceed with this technology project and vendor(s).

Based on the assessment as provided in this report, and assuming that the DVHA executes the mitigation strategies as defined in Attachment 2, BerryDunn recommends that the DVHA continue its engagement with Nava.

1.6 Independent Reviewer Certification

I certify that this Independent Review Report is an independent and unbiased assessment of the proposed solution's acquisition costs, technical architecture, implementation plan, cost-benefit analysis, and impact on net operating costs, based on the information made available to BerryDunn by the State.

E-SIGNED by Charlie Leadbetter
on 2019-04-12 18:22:49 UTC

Independent Reviewer Signature

Date

1.7 Report Acceptance

The electronic signatures below represent the acceptance of this document as the final completed Independent Review Report.

E-SIGNED by Helen Tanona
on 2019-04-12 18:24:13 UTC

ADS Oversight Project Manager

Date

E-SIGNED by John Quinn
on 2019-04-22 18:53:44 UTC

State of Vermont Chief Information Officer

Date

2 Scope of this Independent Review Report

2.1 In-Scope

The scope of this document is fulfilling the requirements of Vermont Statute, Title 3, Chapter 45, §2222(g):

The Secretary of Administration shall obtain independent expert review of any recommendation for any information technology initiated after July 1, 1996, as information technology activity is defined by subdivision (a)(10), when its total cost is \$1,000,000 or greater or when required by the State Chief Information Officer.

The Independent Review Report includes:

- An acquisition cost assessment
- A technology architecture review
- An implementation plan assessment
- A cost analysis and model for benefit analysis
- An impact analysis on net operating costs for the agency carrying out the activity
- An overall risk assessment of the proposed solution

This Independent Review used the following schedule:

- Week of January 14, 2019: Conduct project initiation and a meeting for scheduling a discovery request. (Note: Delay in receiving a fully executed IT Retainer contract impacted the duration of project initiation and documentation request/review efforts.)
- Weeks of January 28, 2019; February 4, 2019; and February 11, 2019: Conduct on-site interviews, and interview the vendor; draft the Independent Review Report and the Risk Register. (Note: Additional documentation received after on-site interviews, delay in conducting an interview with the vendor, and a state holiday impacted the duration of the risk register and report development effort.)
- Week of February 25, 2019, March 4, 2019 and March 11, 2019: Review the risk identification and mitigation strategy with the oversight project manager (OPM) and CPPH1 project team; submit the initial draft Independent Review Report to the OPM, and make initial updates to the Independent Review Report.
- Week of March 18, 2019: Submit the updated draft Independent Review Report to the OPM and CIO.
- Week of April 1, 2019: Present the Independent Review Report to the CIO, complete any follow-up work and updates to the Independent Review Report, and obtain CIO sign-off via the OPM on the Independent Review Report.

2.2 Out-of-Scope

If applicable, this section describes any limits of this review and any area of the project or proposal that were not reviewed.

BerryDunn did not evaluate the original decision to engage Nava for the CPPH1 project or the subsequent sole-source decision.

3 Sources of Information

3.1 Independent Review Participants

This section provides a list of the individuals who participated in this Independent Review.

Table 3.1: Independent Review Participants

Name	Department	Participation Topic(s)
Marie Hayward	AHS	Finance
Susan Whitney	DVHA	Procurement
Cass Madison	DVHA	Program Leadership
Thani Boskailo	DVHA	Project Leadership
Amy Marshall-Carney	ADS – DVHA contract personnel	Project Management
Melissa Rancourt	ADS – DVHA contract personnel	Project Management
Darin Prail	ADS	Technology
Emily Wivell	ADS	Technology
Marcia Schels	ADS	Technology
Seamus Loftus	ADS	Technology

3.2 Independent Review Documentation

The chart below includes a list of the documentation utilized to compile this Independent Review.

Table 3.2: Independent Review Documentation

Document Name	Description	Source
Non-Functional Requirements (NFRs)	Nava's NFRs for the State's document uploader portal (January – August 2019)	ADS
VT Implementation Advanced Planning Document Update (IAPDU)	Conditional federal funding approval letter from the United States Department of Agriculture (USDA), FNS	AHS
Data Flow Diagram	Data flow diagram for the CPPH1 module	ADS
Sprint Planning – Sprint 2	Nava's most recent sprint planning report provided to the State	ADS

Document Name	Description	Source
OnBase Initial Integration Requirements	Document uploader portal and OnBase initial integration requirements using manual indexing	ADS
ADS Strategic Plan	ADS' strategic plan	ADS website
CPPH1 IT ABC Form - Draft	The State's first draft IT ABC form	ADS
CPPH1 IT Customer Portal ABC Form - Approved	The State's approved IT ABC form, signed by all necessary approvers	ADS
CPPH1 IT Customer Portal ABC Form - Revised	The State's most recent version of the IT ABC form, reflecting more accurate estimated DDI costs, not signed	ADS
AHS DVHA Nava 36881 Amendment 1 Routing Package	The State's contract amendment with supporting documentation, such as memos to the Secretary of ADS from the State's IT procurement advisory team (PAT)	ADS
AHS DVHA Nava 36881 Final Signed	The original sole-source, no-cost contract with Nava	ADS
CPPH1 Risk/Issue Log Project Level	A copy of the project risk and issue log as of January 23, 2019	ADS
Cost Allocation Tables	A detailed spreadsheet documenting all IE&E project total costs, including a breakdown of allocation for benefiting programs by fiscal year (FY) quarters	AHS
CPPH1 Technical Architecture Diagram	Final technical architecture as agreed between Nava and the State	ADS
CPPH1 Risk/Issue Log IE&E Program Level	A copy of the IE&E program risk and issue log as of January 23, 2019	ADS
Approved CPPH1 Mini Charter	CPPH1 project charter, dated May 10, 2018, and signed by all necessary approvers	ADS
Revised CPPH1 Mini Charter	CPPH1 project charter, dated January 2, 2019, and not signed by any necessary approvers	ADS
eSigned AHS DVHA Nava Sole Source Memo	DVHA's approved request for approval to enter into a sole source contract amendment with Nava for an Integrated	ADS

Document Name	Description	Source
	Benefits pilot module and associated consulting services and	
IE&E Program Functional Organization Chart Technical Resources	A functional organizational chart for the State's IE&E technical resources	ADS
IE&E Weekly Program/Product/Work stream Report	The State's most recent CPPH1 project status report	ADS
AHS Strategic Plan	AHS's FY2019 – FY2023 strategic plan	AHS website
VT IE&E IAPDU	AHS's annual IAPD-U requesting funding for the IE&E program	AHS

4 Project Information

4.1 Historical Background

This section includes relevant background that resulted in this project.

DVHA is responsible for the management of the State's publicly funded health insurance programs. Its mission is to provide leadership for State stakeholders to improve access, quality, and cost effectiveness in healthcare reform; assist Medicaid members in accessing clinically appropriate health services; administer the State's public health insurance system efficiently and effectively; and collaborate with other healthcare system entities in bringing evidence-based practices to State Medicaid members.

ADS is responsible for developing and deploying IT services and solutions for the State to promote modernization and efficiency. Strategic investments in technology, in conjunction with continuous evaluation and improvement of systems, will aid the State through its transition to digital government.

The State has established an IE&E Program that will implement approximately six distinct modules to help AHS achieve its goal of serving Vermonters efficiently and effectively. One of the modules identified on the IE&E roadmap is a customer portal. The result of the customer portal will be two products, a mobile app for submission of manual verification documentation, and a single streamlined online application for healthcare and financial benefit programs.

In August 2018, DVHA entered into a one-year, sole-source contract with Nava for technical assistance in developing an integrated benefits solution to streamline the intake and processing of eligibility documents. The solution's goal is to reduce the unnecessary burdens associated with submitting verification documentation and ensure accurate and timely eligibility determination for Vermonters in need of health coverage and financial assistance. Nava's services provided to the State were reimbursed to Nava through a philanthropic sponsored program called the Integrated Benefits Initiative, which resulted in no cost to the State. However, due to philanthropic funding for the Integrated Benefits Initiative ending on December 31, 2018, Nava would be unable to continuing working at no cost to the State.

In accordance with Bulletin 3.5, Section VIII, 8, D, DVHA requested approval from the Agency of Administration (AoA) to enter into an amendment to the sole-source contract in order to provide funding for the delivery phase of the scope of work, which focuses on delivering a field-tested public-facing document uploader portal, technical documentation, and training to the State's technical resources. DVHA received approval from AoA in November 2018, and the Nava 36881 contract amendment was executed on January 22, 2019.

The State's Integrated Benefits solution initiative is taking a modular approach to minimize financial risk and produce timely business value. This agile, modular method of project management and service delivery is a new strategy for the State, but has proven to be successful in other states.

4.2 Project Goal

This section includes an explanation regarding why the project is being undertaken.

The State seeks to achieve the following objectives through implementation of an Integrated Benefits solution:

Customer Service: The Integrated Benefits solution will create convenient and user-friendly alternatives for document submission. The solution would increase the number of options available to Vermonters to submit documents required for eligibility determination. These options also minimize the cost to the applicant in purchasing postage and/or paying for gas to deliver documents in person. The efficient and streamlined solution creates fewer delays, resulting in greater service to Vermonters in need of health coverage and financial assistance.

Time Savings: The solution would expedite the process of initial notification, document mailing, scanning and indexing, and final eligibility determination and enrollment into a streamlined process. Eliminating manual steps would lift some of the burden for caseworkers who must verify an applicant's eligibility, and for staff who document intake and processing.

4.3 Project Scope

This section describes the project scope and major deliverables.

This scope of work includes the following services:

- **Professional services researching and prototyping** pilot designs for user experience and technical feasibility.
- **Professional services training staff** as needed.
- **Professional services collecting and evaluating** key metrics.
- **Professional services for tool optimization** in the field and expansion to more programs or **professional services to build the final tool** based on what was learned in the pilot.
- **Professional services for adding functionality** to send documents to Application and Document Processing Center (ADPC) drives or DVHA secure inboxes.

- **Professional services to provide specification and implementation feedback** for CPPH1 to teams that will connect the tool to State Systems.

4.3.1 Major Deliverables

A summary of deliverables the vendor is responsible for maintaining and updating is provided in Table 4.1. Note that the vendor completed some deliverables as a part of the initial contract, prior to the amendment.

Table 4.1: Deliverables in the Amendment

Deliverable	Description	Frequency	Project Phase
Solution Insights and Recommendations	Insights and recommendations for user experience, technical implementation, and service improvements for uploading and processing eligibility documents, including user-facing and technical prototypes to test solutions and implementation strategies and definition of key metrics to measure success.	Prior to start of pilot.	Discovery
Proposed Pilot Blueprint	A blue print outlining the proposed pilot experience for clients and caseworks for the document uploader tool.	Prior to start of pilot.	Discovery
Pilot Plan	Pilot plan detailing activities, pilot participation outreach, and needs from a product, technical, and operational perspective.	Prior to start of pilot.	Discovery
Pilot Tool	The tool piloted with a small group of users. Depending on the use case chosen, pilot participants could be either Vermonters or State workers. The team will seek to minimize the amount of State time needed to administer the pilot.	Following pilot completion.	Pilot
Experience Blueprint	A blueprint, outlining the end-to-end experience for clients and caseworkers, for improving the experience of verifying client eligibility.	Following pilot completion.	Pilot
Pilot Findings Report	Report of key metrics and findings from the pilot. This deliverable requires the pilot to run for at least four weeks. The Contractor's goal is to run the pilot phase for four weeks during the period of performance. If that duration changes due	Following pilot completion.	Pilot



Deliverable	Description	Frequency	Project Phase
	to the scope of the pilot or outside events, Contractor will provide a report for the run during the period of performance but will recommend that the State continue the pilot for at least four weeks to gather data for metrics.		
Implementation Recommendations	Implementation recommendations for CPPH1: <ul style="list-style-type: none"> • Draft architectural diagrams that detail the flow of documents through the submission and verification process and recommended service boundaries • Proposed non-functional requirements, including system reliability and maintainability. • Draft product roadmap for the subsequent phase. • Program and operational recommendations for the subsequent phase. 	Following pilot completion.	Pilot
Document Upload	A field-tested, Vermonter-facing document upload allowing applicants to submit verification documents to support benefits applications and caseworkers to access those documents through secure inboxes and shared drives. The team will provide any documentation required to submit the uploader tool for a security review and official Authority to Operate.	Following pilot completion.	Delivery
Application Programming Interface (API) Connection to OnBase	The team will provide documentation and, if appropriate, implementation feedback on an API connection to OnBase either directly or through the Hub.	Following upload tool completion.	Delivery
Product Roadmap	Future-facing Product Roadmap for CPPH1	Following upload tool completion.	Delivery
Documentation, Training, and Handoff	Documentation, training, and handoff to State-assigned technical resources, including the API specifications for connecting to OnBase and any	Prior to project completion.	Delivery

Deliverable	Description	Frequency	Project Phase
	documentation needed to maintain the uploader tool.		

4.4 Project Phases, Milestones, and Schedule

This section provides a list of the major project phases and milestones, as well as a high-level schedule.

A summary of proposed project phases, milestones, and estimated completion dates is provided in Table 4.2. Note that the vendor has completed some deliverables as a part of the initial contract, prior to the amendment. See Attachment 3 for the project master schedule.

Table 4.2: Vendor Project Phases and Milestones

Project Phase	Milestone(s)	Estimated Completion Dates
Discovery Phase	<ul style="list-style-type: none"> • Midpoint presentation • Final presentation 	Completed
Pilot Phase	<ul style="list-style-type: none"> • Pilot phase kickoff • Uploader sends documents to secure inboxes • Pilot launch • Pilot criteria met • Report back of result 	Completed
Delivery Phase	<ul style="list-style-type: none"> • Connection to OnBase available in test environment (shared milestone with the API or Integration Platform teams) • Submission of uploader for security review • Handoff of final CPPH1 deliverables and documentation to the State 	July 2019

5 Acquisition Cost Assessment

This section lists all acquisition costs in the table below (i.e., the comprehensive list of the one-time costs to acquire the proposed system/service). It does not include any costs that reoccur during the system/service lifecycle.

Table 5.1: Acquisition Cost Assessment

Acquisition Costs	Cost	Comments
Hardware Costs	\$0	No hardware costs were identified.
Software Costs	\$0	No software costs were identified.
Hosting Provider	\$100,000.00	
Other Contracted Professional Services for Implementation	\$1,319,302.80	Per the amendment, services provided by Nava will not exceed \$1,321,110 amount.
Independent Review	\$23,000	This value was obtained from the BerryDunn Independent Review contract.
3% ADS Estimated Charge for EA & Project Oversight	\$42,579.08	This value represents 3% of hosting and professional services for implementation provided by Nava.
Total One-Time Acquisition Costs	\$1,484,881.88	

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

BerryDunn validated costs through document analysis, on-site interviews, and follow-up communications with the State. Some specifics of cost validation include:

- No additional hardware or software costs were identified for this implementation.
- Hosting provider cost was found in the CPPH1 IT ABC Form.
- Contracted professional services for implementation cost was found in the contract amendment.
- Cost for the independent review was obtained from the contract between BerryDunn and the State.
- ADS estimates for EA and project oversight is 3% of the total for hosting and professional services provided by Nava (\$1,419,302.80).

2. Cost Comparison: How do the acquisition costs of the proposed solution compare to what others have paid for similar solutions? Will the State be paying more, less or about the same?

The Nava contract amendment outlines technical services for an application development project that is unique to the State of Vermont. Therefore, there are no solutions that can be adequately compared to this project for acquisition costs.

Instead, BerryDunn conducted market research to compare standard hourly rates for the professional roles outlined in the contract amendment. Our team found that the rates for the Program Manager, Design Lead, Engineering Lead, Engineer, Designer/Researcher, and Product Manager roles being fulfilled by Nava are consistent with national averages.

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

- As outlined above, the State appears to be paying a comparable price to what other states are potentially paying for similar services.

4. Additional Comments on Acquisition Costs:

BerryDunn has no additional comments on acquisition costs.

6 Technology Architecture Review

After performing an independent technology architecture review of the proposed solution, BerryDunn's review considers the following factors.

1. **State's IT Strategic Plan:** Describe how the proposed solution aligns with each of the State's IT Strategic principles:
 - 1) Leverage successes of others, learning best practices from outside Vermont
 - 2) Leverage shared services and cloud-based IT, taking advantage of IT economies of scale
 - 3) Adapt the Vermont workforce to the evolving needs of state government
 - 4) Apply enterprise architecture (EA) principles to drive digital transformation based on business needs
 - 5) Couple IT with business process optimization to improve overall productivity and customer service
 - 6) Optimize IT investments via sound project management
 - 7) Manage data commensurate with risk
 - 8) Incorporate metrics to measure outcomes

An ADS representative has not completed a formal review of the technical architecture of the proposed system due to technical resource constraints.

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

The State project team, made up of key DVHA and ADS personnel, evaluated key metrics of the document uploader pilot before deciding to continue DDI efforts to advance the current capabilities and expand the functionality to new user groups. This leads the BerryDunn team to the conclusion that Nava is capable of providing the necessary professional services to enable the State with implementing a sustainable technical solution.

3. **Security:** Does the proposed solution have the appropriate level of security for the proposed activity it will perform (including any applicable State or federal standards)? Please describe.

The IE&E customer portal module, which includes the document uploader, will require review by the Centers for Medicare and Medicaid Services (CMS) security team as part of Vermont's Authority to Connect. Nava has identified applicable state and federal security requirements for the document uploader portal, such as MARS-E and HIPAA, and they are

working with the State's Information Security Analyst on completing security documentation required by the State and its federal partners.

- 4. Compliance with the principles enumerated in the ADS Strategic Plan of Jan 12, 2018 (<https://digitalservices.vermont.gov/sites/digitalservices/files/documents/ADS%20Strategy%202018.pdf>):** Comment on the solution's compliance with accessibility standards as outlined in this statement of work (SOW).

The NFRs for the document uploader portal include applicable state and federal usability and accessibility principles and requirements, including Section 508 of the Rehabilitation Act, Section 1194.22 of the Code of Federal Regulations for Web-based intranet and internet information and applications.

- 5. Disaster Recovery:** What is your assessment of the proposed solution's disaster recovery plan; do you think it is adequate? How might it be improved? Are there specific actions that you would recommend to improve the plan?

Nava is leveraging the State's hosting provider for the document uploader portal, so the State is responsible for ensuring the disaster recovery plans are in place. However, Nava has provided disaster recovery NFRs for the solution.

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

The document uploader portal will be hosted and maintained by the State, where State technical resources will be responsible for satisfying data retention requirements. However, Nava has provided data retention NFRs for the solution.

- 7. Service-Level Agreement:** What are the post-implementation services and service levels required by the State? Is the vendor proposed service-level agreement adequate to meet these needs in your judgement?

The current contract and amendment does not include post-implementation services for the document uploader portal, as it will be hosted and maintained by the State.

- 8. System Integration:** Is the data export reporting capability of the proposed solution consumable by the State? What data is exchanged and what systems (State and non-State) will the solution integrate/interface with?

A significant component of the CPPH1 solution requires integration between Nava's developed document uploader portal and the State's OnBase system and authentication solution.

The data exchange between the document uploader portal and OnBase includes document types and personally identifiable information (PII) about the head of household for health

coverage or financial assistance programs. This information exchange is necessary to automate the indexing of documents and eligibility determination workflows.

The data exchange between the document uploader portal and authentication includes existing user credentials or new information necessary to create a new account. This data exchange is required to authenticating Vermonters logging using an existing account and allowing Vermonters the ability to create an account when one does not exist.

Additional Comments on Architecture: N/A.

7 Assessment of Implementation Plan

After assessing the Implementation Plan, BerryDunn provides the following feedback.

1. The reality of the implementation timetable.

Nava has proven their ability to adhere to the original implementation master schedule in the contract as well as the refined schedule in the amendment. However, there is language in the amendment that states:

*“*Note the schedule is designed to be flexible to the decisions regarding APIs or an Integration Hub, but our schedule may be impacted if teams we depend on are not able to deliver on time.”*

Risks that could have an impact on Nava’s implementation master schedule have been identified through this review and are articulate in detail in Attachment 2.

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

During our initial review of project documentation, we assumed that DVHA’s Health Access Eligibility and Enrollment Unit (HAEEU) was the next user group to pilot the document uploader portal’s capabilities; however, during our interview with Nava we learned that DVHA’s Long-Term Care workers were also slated as a user group.

Both Nava and the State’s product owner expressed their confidence that the business units are ready and eager to be part of the CPPH1 project DDI efforts.

3. Do the milestones and deliverables proposed by the vendor provide enough detail to hold the vendor accountable for meeting the business needs in these areas?

The milestones and deliverables in the amendment are detailed enough to hold Nava accountable for meeting the business needs. The details for the milestones and deliverables can be found in Section 4.3.1 and 4.4 in this report.

A. Project Management

The contract amendment requires Nava to provide a full-time program manager and product manager, who are responsible for managing the project activities with support and oversight from the State’s project manager. The State has leveraged its partnership with Nava, 18F, and Code for America to ensure the overall project management for the document uploader portal is aligned with agile software development methodology and best practices. Nava’s program manager has been part of the project team since the execution of the contract in August 2018 and was accepted as a full-time employee (FTE) for the scope of work in the

amendment. This leads our team to believe that Nava's project management services are meeting the business needs.

B. Training

Nava is responsible for supporting end-user training for new user groups, identified by the State's product owner, as well as training to active user groups when there are enhancements to the solution. Nava is also responsible for training the State's technical staff that will be responsible for any remaining DDI activities post contract and for maintaining the document uploader portal post implementation.

C. Testing

Nava and the State are testing iteratively as part of each sprint, rather than waiting until the final code has been developed. This allows the team to address any issues at each step in the development process to ensure defects are resolved timely.

D. Design

Nava brings a multidisciplinary team for a user-centric approach to the design of the State's document uploader portal. There is a dedicated Designer/Researcher and Design Lead that is focused on collecting information from the users to help inform each iteration of the design process. With this approach, the portal will more than likely meet the users' expectations and requirements.

E. Conversion (If Applicable)

No data is being converted as part of this initiative.

F. Implementation Planning

Technical activities are being managed in two week sprints, according to the document uploader portal roadmap. Due to multiple dependencies on external systems, the team is working closely with the State to ensure their activities are aligned with other teams to ensure the project remains on schedule.

G. Implementation

As stated above, technical activities are being managed in two-week sprints and the State's project manager and product owner are working with Nava to ensure activities with dependencies on external systems are coordinated to ensure successful implementation.

4. Does the State have a resource lined up to be the project manager on the project? If so, does this person possess the skills and experience to be successful in this role in your judgement? Please explain.

ADS has identified a project manager to manage CPPH1 DDI effort. The designated project manager has extensive experience working with DVHA on IT projects and thoroughly understands the needs and challenges currently facing the State.

Additional comments on the Implementation Plan:

N/A

8 Cost-Benefit Analysis

This section involves four tasks:

Perform an independent Cost-Benefit Analysis. Information provided by the State may be used, but the reviewer must validate it for accuracy and completeness.

- 1) *Provide a Lifecycle Cost-Benefit Analysis spreadsheet as an **Attachment 1** to this report. A sample format is provided at the end of this report template.*
 - A. *The cost component of the cost/benefit analysis will include all one-time acquisition costs, ongoing operational costs (licensing, maintenance, refresh, etc.) plus internal costs of staffing and "other costs". "Other costs" include the cost of personnel or contractors required for this solution, enhancements/upgrades planned for the lifecycle, consumables, costs associated with system interfaces, and any costs of upgrading the current environment to accept the proposed solution (new facilities, etc.).*
 - B. *The benefit side of the cost/benefit will include: 1. Intangible items for which an actual cost cannot be attributed. 2. Tangible savings/benefit, such as actual savings in personnel, contractors, or operating expense associated with existing methods of accomplishing the work which will be performed by the proposed solution. Tangible benefits also include additional revenue which may result from the proposed solution.*
 - C. *The cost-benefit analysis will be for the IT activity's lifecycle.*
 - D. *The format will be a column spreadsheet with one column for each year in the lifecycle. The rows will contain the itemized costs with totals followed by the itemized benefits with totals.*
 - E. *Identify the source of funds (federal, state, one-time vs. ongoing). For example, implementation may be covered by federal dollars but operations will be paid by State funds.*
- 3) *Perform an analysis of the IT ABC form (Business Case/Cost Analysis) completed by the Business.*
- 4) *Respond to the questions/items listed below.*

1. **Analysis Description:** Provide a narrative summary of the cost-benefit analysis conducted. Be sure to indicate how the costs were independently validated.

BerryDunn evaluated the costs provided by the State. Costs were included in the contract amendment, IT ABC form, Cost Allocation Tables, Project Charter, and the approved IAPDU provided by the State. BerryDunn verified the costs provided by the State in its own lifecycle cost sheet and adjusted numbers as appropriate, including costs for professional services for implementation, ADS EA and project oversight, and this independent review.

The scope of this Independent Review is limited to the Nava PBC contract and amendment; therefore, State labor costs and any staff augmentation costs (included under professional services for implementation in the IT ABC form) were not included in cost calculations. BerryDunn calculated professional services costs from hourly rates provided by the State, assuming the project would run for 29 weeks and that professionals would work 40 hours per week.

The benefits of the solution were found in the CPPH1 project charter and incorporated in this report. Based on the information made available to our team, we believe that there is no plan for staff reductions. There are many intangible benefits, or benefits that can only be speculatively quantified, such as improved processing times.

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

- The scope of the cost benefit analysis is limited to the Nava contract and amendment.
- There is a five-year life cycle.
- The implementation period is separate from maintenance and support life cycle for the purposes of cost calculating.
- State labor and staff augmentation costs are not included in this analysis because the scope is limited to the Nava contract and amendment.
- Rates for professional services are based on information provided by the state and a duration of 32 weeks at 40 hours a week, per the cost amendment to the Nava contract.

3. Funding: Provide the funding source(s). If multiple sources, indicate the percentage of each source for both Acquisition Costs and ongoing Operational Costs over the duration of the system/service lifecycle.

The State has received funding through CMS, the Administration of Children and Families (ACF), and has received conditional approval for its funding request from FNS outlined in an IAPD. As a result, costs will be shared by both federal and State agencies with these federal partners paying 90% of the project acquisition costs.

4. Tangible Costs and Benefits: Provide a list and description of the tangible costs and benefits of this project. It is “tangible” if it has a direct impact on implementation or operating costs (an increase = a tangible cost, and a decrease = a tangible benefit). The cost of software licenses is an example of a tangible cost. Projected annual operating cost savings is an example of a tangible benefit.

Tangible Benefits

Based on our analysis, tangible benefits are speculative. ADPC staff who will be relieved of manual back-end document processing due to business process automation will be reallocated to other responsibilities within the ADPC, and therefore there will be no overall operational cost deduction to the State.

Tangible Costs

The largest tangible cost of the new system is the professional services needed for its configuration, installation, and implementation spanning FY2019 and FY2020 (about \$1.3 million). This is a cost the State would not have to pay if it were to keep the current system and manual business processes.

5. **Intangible Costs and Benefits:** Provide a list and descriptions of the intangible costs and benefits. It's "intangible" if it has a positive or negative impact but is not cost-related. Examples: Customer Service is expected to improve (intangible benefit) or Employee Morale is expected to decline (intangible cost).

- **Increasing available options to Vermonters for the submission of verification documentation** – If the State cannot verify information through electronic data sources, the State must ask the applicant for additional documentation. Currently, the only options to provide copies of the documentation is in the mail or in person at one of AHS's District Offices. The document uploader portal will provide another option for submitting additional documentation required for eligibility determination.
- **Minimize manual intervention for scanning and indexing verification documentation and decrease the time it takes to determine eligibility** – Receiving, sorting, scanning and indexing verification documents delays the time it takes for eligibility workers receiving the necessary information to determine initial eligibility determination and re-determination when Vermonters have a change in circumstance. The document uploader portal and integration with the State's ECM and authentication solutions will enable AHS to achieve its 2019 goal of improving eligibility and enrollment processes to reduce duration of process time and increase eligibility and enrollment accuracy.
- **Minimize the cost for Vermonters providing documentation to the State** – AHS serves some of the most needy and vulnerable citizens in Vermont, most of which are doing what they can to make ends meet and do not have the resources (i.e. transportation, money for gas or postage) to ensure paper documentation is provided to the State in time to ensure they do not lose their benefits. The implementation of the document uploader portal will ease the burden of applying for and receiving timely benefits from AHS.

6. **Costs vs. Benefits:** Do the benefits of this project (consider both tangible and intangible) outweigh the costs in your opinion? Please elaborate on your response.

While the tangible benefits appear to be negligible, our opinion is that the intangible benefits outweigh the costs.

7. **IT ABC Form Review:** Review the IT ABC form (Business Case/Cost Analysis) created by the Business for this project. Is the information consistent with your Independent Review and analysis? If not, please describe. Is the lifecycle that was used appropriate for the technology being proposed? If not, please explain.

Due to the difference between the scope of the CPPH1 project and the scope for the independent review of the Nava contract and amendment, our team did not fully assess and use all of the financial information included on the most recent CPPH1 IT ABC form. The assumptions used for our cost benefit analysis and the impact analysis on operating costs are identified throughout this report under relevant headings.

9 Impact Analysis on Net Operating Costs

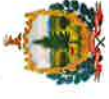
- 1.) *Perform a lifecycle cost impact analysis on net operating costs for the agency carrying out the activity, minimally including the following:*
 - a) *Estimated future-state ongoing annual operating costs, and estimated lifecycle-operating costs. Consider also if the project will yield additional revenue generation that may offset any increase in operating costs.*
 - b) *Current-state annual operating costs; assess total current costs over span of new IT activity lifecycle*
 - c) *Provide a breakdown of funding sources (federal, state, one-time vs. ongoing)*
- 2.) *Create a table to illustrate the net operating cost impact.*
- 3.) *Respond to the items below.*

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



2. Table 9-1: Lifecycle Costs (in FYs)

Impact on Operating Costs	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	Lifecycle Total
Professional Services (Non-Software Costs)						
Current Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Projected Costs	\$1,029,056.18	\$290,246.62	\$0.00	\$0.00	\$0.00	\$1,319,302.80
Hosting, Software, Licensing, State M&O						
Current Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Projected Costs	\$0.00	\$40,000.00	\$80,000.00	\$160,000.00	\$160,000.00	\$440,000.00
Baseline Annual Current Cost	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Baseline Annual Projected Costs	\$1,029,056.18	\$330,246.62	\$80,000.00	\$160,000.00	\$160,000.00	\$1,759,302.80
Cumulative Current Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Cumulative Projected Costs	\$1,029,056.18	\$1,359,302.80	\$1,439,302.80	\$1,599,302.80	\$1,759,302.80	\$1,759,302.80
Net Impact on Professional Services	(\$1,029,056.18)	(\$290,246.62)	\$0.00	\$0.00	\$0.00	(\$1,319,302.80)
Net Impact on Hosting, Software, Licensing, State M&O	\$0.00	(\$40,000.00)	(\$80,000.00)	(\$160,000.00)	(\$160,000.00)	(\$440,000.00)



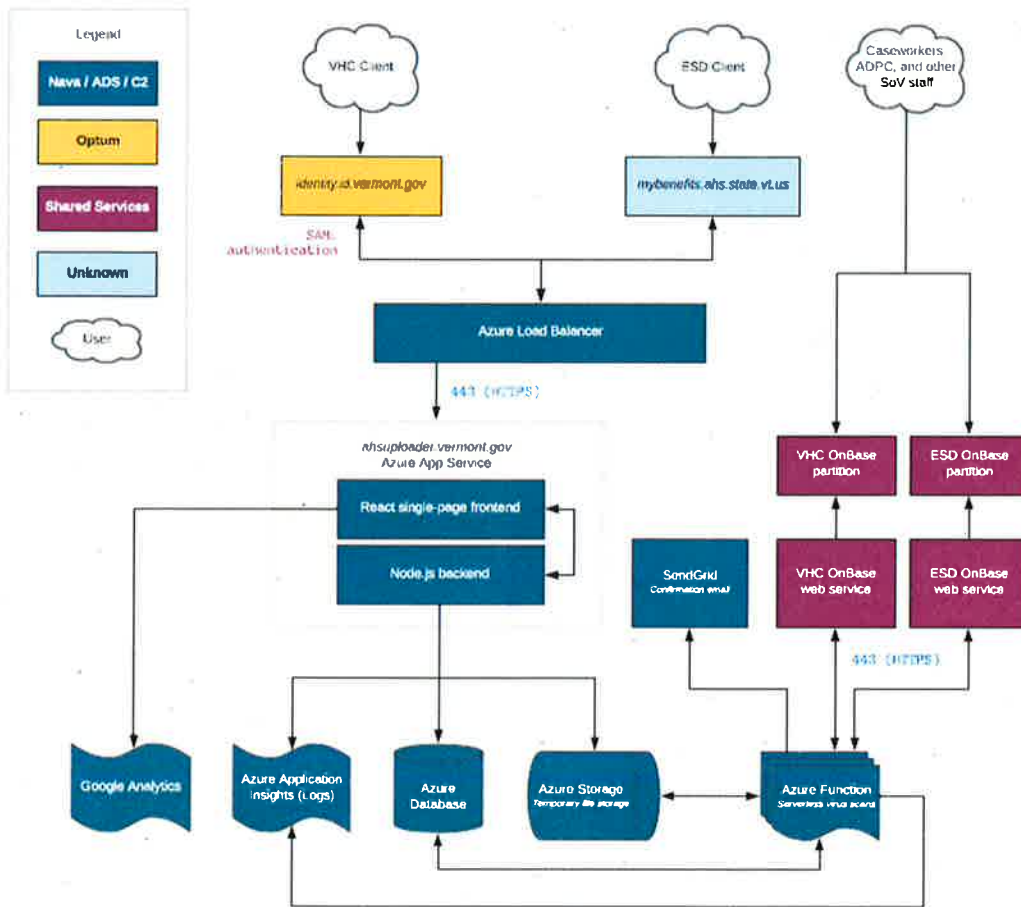
Impact on Operating Costs	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	Lifecycle Total
Net Impact on Operating Costs:	(\$1,029,056.18)	(\$330,246.62)	(\$80,000)	(\$160,000.00)	(\$160,000.00)	(\$1,759,302.80)

3. Provide a narrative summary of the analysis conducted and include a list of any assumptions.

For the purpose of impact analysis of net operating costs, BerryDunn applied the following assumptions:

- BerryDunn assumed that the scope of the net operating costs is for Nava PBC services only. As shown in Figure 1, these deliverables do not encompass all components of the proposed technical architecture for the CPPH1 solution.
- BerryDunn assumed that the State will not realize immediate savings in state labor costs for ADPC staff, as they will be reallocated to other work within the business unit.
- BerryDunn assumed that the current annual cost for AHS OnBase licenses were not in scope nor going to be eliminated with the implementation of the document uploader portal.

Figure 1. Technical Architecture Diagram



4. Explain any net operating increases that will be covered by federal funding. Will this funding cover the entire lifecycle? If not, please provide the breakouts by year.

As discussed in Section 8, the net operating expense increases will be partially covered by federal funding. For acquisition costs, federal partners will pay 90% and the State will pay 10%. For maintenance costs over the lifecycle of the solution, federal partners will pay 75% and the State will pay 25%.

5. What is the break-even point for this IT Activity (considering implementation and ongoing operating costs)?

Based on the State's estimated DDI cost, there is a net annual increase in operational costs, with no break-even point.

10 Risk Assessment and Risk Register

This section describes the process for development of a Risk Register; including the following activities:

- A. *Ask the Independent Review participants to provide a list of the risks that they have identified and their strategies for addressing those risks.*
- B. *Independently validate the risk information provided by the State and/or vendor and assess their risk strategies.*
- C. *Identify any additional risks.*
- D. *Ask the Business to respond to your identified risks, as well as provide strategies to address them.*
- E. *Assess the risks strategies provided by the Business for the additional risks you identified.*
- F. *Document all this information in a Risk Register and label it Attachment 2. The Risk Register should include the following:*
 - **Source of Risk:** *Project, Proposed Solution, Vendor or Other*
 - **Risk Description:** *Provide a description of what the risk entails*
 - **Risk ratings to indicate:** *Likelihood and probability of risk occurrence; Impact should risk occur; and Overall risk rating (high, medium or low priority)*
 - **State's Planned Risk Strategy:** *Avoid, Mitigate, Transfer or Accept*
 - **State's Planned Risk Response:** *Describe what the State plans to do (if anything) to address the risk*
 - **Timing of Risk Response:** *Describe the planned timing for carrying out the risk response (e.g. prior to the start of the project, during the Planning Phase, prior to implementation, etc.)*
1. **Reviewer's Assessment of State's Planned Response:** *Indicate if the planned response is adequate/appropriate in your judgment and if not what would you recommend.*

Additional Comments on Risks:

The risks identified during this Independent Review can be found in the Risk Register in Section 12 of this report.



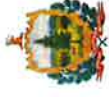
11 Attachment 1 – Lifecycle Cost-Benefit Analysis

Table 11.1 Life Cycle Cost Analysis

Description	Initial Implementation FY 2019	Initial Implementation FY 2020	Maintenance FY2020	Maintenance FY 2021	Maintenance FY 2022	Maintenance FY2023	Total
Hardware							
N/A	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Software							
N/A	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Professional Services							
Program Manager	\$196,730.66	\$55,488.14	\$ -	\$ -	\$ -	\$ -	\$252,218.80
Product Manager	\$158,900.98	\$44,818.22	\$ -	\$ -	\$ -	\$ -	\$203,719.20
Lead Engineer	\$189,166.54	\$53,354.66	\$ -	\$ -	\$ -	\$ -	\$242,521.20
Engineer	\$166,465.10	\$46,951.70	\$ -	\$ -	\$ -	\$ -	\$213,416.80
Lead Designer	\$166,465.10	\$46,951.70	\$ -	\$ -	\$ -	\$ -	\$213,416.80
Designer	\$151,327.80	\$42,682.20	\$ -	\$ -	\$ -	\$ -	\$194,010.00
Other							
Hosting Fees	\$100,000.00	\$ -	\$100,000.00	\$100,000.00	\$100,000.00	\$100,000.00	\$500,000.00



Description	Initial Implementation FY 2019	Initial Implementation FY 2020	Maintenance FY2020	Maintenance FY 2021	Maintenance FY 2022	Maintenance FY2023	Total
Technical Staff/State Labor for Support/ Maintenance	\$ -	\$ -	\$60,000.00	\$60,000.00	\$60,000.00	\$60,000.00	\$240,000.00
Totals							
Sub-Total	\$1,129,056.18	\$290,246.62	\$160,000	\$160,000	\$160,000	\$160,000	\$2,242,302.80
Add 3% ADS Estimated Charge for EA and Project Oversight	\$33,871.69	\$8,707.40	\$ -	\$ -	\$ -	\$ -	\$42,579.09
Revised Sub-Total (Implementation Costs with ADS estimated costs)	\$1,162,927.87	\$298,954.02	\$160,000	\$160,000	\$160,000	\$160,000	\$2,284,881.89
Add Independent Review	\$23,000.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$23,000.00
Final Total	\$1,208,927.87	\$298,954.02	\$160,000	\$160,000	\$160,000	\$160,000	\$2,307,881.89
Total Implementation Costs to be paid with State Funds	\$120,892.79	\$29,895.40	\$ -	\$ -	\$ -	\$ -	\$150,788.19



Description	Initial Implementation		Maintenance				Total
	FY 2019	FY 2020	FY 2020	FY 2021	FY 2022	FY 2023	
Total Lifecycle Operating Costs to be paid with State Funds	\$ -	\$ -	\$40,000.00	\$40,000.00	\$40,000.00	\$40,000.00	\$160,000
Total Lifecycle Costs to be paid with State funds	\$120,892.79	\$29,895.40	\$40,000.00	\$40,000.00	\$40,000.00	\$40,000.00	\$310,788.19

12 Attachment 2 – Risk Register

Data Element	Description
Risk #	Sequential number assigned to each risk to be used when referring to the risk.
Risk Probability, Impact, Overall Rating	Two-value indicator of the potential impact of the risk if it were to occur, along with an indicator of the probability of the risk occurring. Assigned values are high, medium, or low.
Source of Risk	Source of the risk, which may be the Project, Proposed Solution, Vendor, or Other.
Risk Description	Brief narrative description of the identified risk.
State’s Planned Risk Strategy	Strategy the State plans to take to address the risk. Assigned values are Avoid, Mitigate, Transfer, or Accept.
State’s Planned Risk Response	Risk response the State plans to adopt based on discussions between State staff and BerryDunn reviewers.
Timing of Risk Response	Planned timing for carrying out the risk response, which may be Prior to Contract Execution or Subsequent to Contract Execution.
Reviewer’s Assessment of State’s Planned Response	Indication of whether BerryDunn reviewers feel the planned response is adequate and appropriate, and recommendations if not.

Risk #:	Risk Likelihood/Probability:	Risk Impact:	Overall Risk Rating:
1	Medium	High	High
Source of Risk: BerryDunn, Project, Vendor			
<p>Risk Description: There is risk to the project scope and schedule due to dependencies on system readiness of the State’s enterprise content management system (OnBase). The Customer Portal Phase 1 (CPPH1) product roadmap and the scope of work outlined in the amendment for Contract #36881 requires Nava to build and test integration between the document uploader portal developed by Nava and the State’s two instances of OnBase (one for Vermont Health Connect [VHC] and one for Economic Services Division [ESD]). These integrations are necessary to automate the indexing of verification documents and streamline eligibility determination workflows.</p> <p>OnBase system readiness for the CPPH1 project is dependent on the following:</p> <ul style="list-style-type: none"> • Implementation of OnBase for VHC (Integrated Eligibility & Enrollment [IE&E] Module 2: Enterprise Content Management [ECM] project) <ul style="list-style-type: none"> ○ The ECM project is transitioning VHC from using Oracle WebCenter to OnBase for scanning, indexing, workflow, and viewing documentation and notices. • The Agency of Human Services (AHS) infrastructure move to the data center at Tech Vault 			



- AHS is moving their IT infrastructure from the State's data center at National Life to the data center at Tech Vault in Williston. This infrastructure includes the OnBase environments for ESD.

There is risk to the project scope and schedule if the State is not able to satisfy Nava's OnBase integration technical requirements and timelines for OnBase integration.

State's Planned Risk Strategy: Mitigate

State's Planned Risk Response: The State is aware of and tracking this risk closely. The State is mitigating the risk by putting additional resources into the OnBase projects to ensure it stays on schedule. This includes managing security remediation activities as the number priority within the IE&E program and bringing in additional state and contracted resources to help execute OnBase related items. The Program Sponsor, Program Manager, Chief Information Security Officer, and Chief Technology Officer are involved with this project every day and are actively troubleshooting obstacles as they arise.

1. Firewall rules have been fixed, so the document uploader portal can now talk to our Dev and Test OnBase environments. Development and Testing can proceed.
2. The remaining components of OnBase Dev and Test environments (which is just the backend SQL servers) will be moved from National Life to Tech Vault next week.
3. Production OnBase environment migration from National Life to Tech Vault will be scheduled based on the timing, effort and steps captured as result of the full Dev & Test environment moves; but should be able to meet schedule deadlines based on the migration timelines we've seen in migration other agencies and applications.

Timing of Risk Response: The additional resources were recently added to mitigate this risk and the state will continue to mitigate and track on a regular basis.

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

Risk #:	Risk Likelihood/Probability:	Risk Impact:	Overall Risk Rating:
2	Medium	Medium	Medium
Source of Risk: BerryDunn			
<p>Risk Description: There is a risk to the project scope and schedule related to unfulfilled requirements by the State due to a technical resource limitation. The State's technical lead for the CPPH1 project is also responsible for fulfilling the responsibilities of the Integrated Eligibility and Enrollment (IE&E) program technical strategist and the State integration team lead.</p> <p>The potential over allocation of the State's project technical lead, in addition to Enterprise Architect and Developer vacancies identified in the IE&E technical organizational chart provided by ADS, presents risk to the project scope and schedule.</p>			
State's Planned Risk Strategy: Mitigate			

State's Planned Risk Response: The state is preparing a job posting for the IE&E Technical Strategist position. Deputy IT Lead for the Agency of Digital (assigned to AHS) and the State's Chief Technology Officer are stepping in to provide coverage of assignments to the IE&E Technical Strategist role. Meanwhile, while the CPPH1 Technical Lead and the Integration Team Lead are still one person, this is currently sufficient since the Integration Team is nearly 100% focused on IE&E in its early lifecycle.

Timing of Risk Response: We expect the IE&E Technical Strategist position to be posted within the next two weeks and we are planning a 6-week hiring cycle (although it could be much sooner, depending on responses).

Reviewer's Assessment of State's Planned Response: During our interviews with the State, it was mentioned that it's been difficult hiring technical resources. The State's response is acceptable as long as leadership makes recruiting and hiring qualified staff as a high priority for the IE&E Program's projects.

Risk #:	Risk Likelihood/Probability:	Risk Impact:	Overall Risk Rating:
3	Low	Low	Low

Source of Risk: BerryDunn, Project, Vendor

Risk Description: There is risk to the project scope and schedule due to dependencies on system readiness of the State's authentication solution. The scope of work outlined in the amendment does not require Nava to build and test integration between the document uploader portal and the State's authentication solution; however, there is a documented plan to build and test authentication capabilities in order to automate the association of verification documents uploaded by Vermonters to existing case and contact records.

This plan was derived due to the dependency on an upgrade to the State's Oracle Identity and Access Management (IAM) solution and modifications to the authentication layer, which will not be available until mid-2019.

The Nava contract ends on August 14, 2019, which may not allow adequate time for Nava to fully execute on the agreed upon plan for building and testing integration between the document uploader portal and an authentication service, resulting in the State being ultimately responsible for those DDI efforts.

State's Planned Risk Strategy: Accept

State's Planned Risk Response: The responsibility of building an authentication solution will fall to the State and C2, but during Nava's period of performance the State is planning for Nava to connect the document uploader portal to a lower environment integration with the authentication solution.

The State has contracted with NAVA to complete the following:

From the contract:

During the delivery phase, the joint Contractor and VT Product Team will focus on optimizing the uploader tool as well as providing uploader specifications and feedback to the teams responsible



on connecting the uploader to State Systems such as OnBase, an Integration Platform or an IE authentication system.

NAVA has already provided this information to the state, (it is attached in the State's response – Product strategy, OnBase Initial Integration using manual indexing, proposed plan for authentication).

In addition, the contract defines that Nava will provide the state with the below. Please note that the API & OnBase teams, State's integration platform team, and the state's IAM team are not Nava.

Contractor shall be prepared to provide CPPH1 specifications and implementation feedback to teams responsible for connecting to other State systems, such as:

The State's API and OnBase team(s) to test connection to OnBase and any

- *CPPH1 specifications needed for security documentation.*
- *The State's Integration Platform team to test a connection to OnBase through a hub and any CPPHI specifications needed for security documentation.*
- *The State's IAM team to test an authentication layer and any CPPH1 specifications needed for security documentation.*

As noted early this information has already been provided to the state in the attached documentation.

Timing of Risk Response: N/A

Reviewer's Assessment of State's Planned Response: The State's response is acceptable due to the fact that Nava has provided the authentication specifications and implementation feedback to the State, which was provided to BerryDunn after the IR project's information gathering and on-site interviews activities.

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

Source of Risk: BerryDunn

Risk Description: There is a financial risk due to the State receiving conditional approval from the United States Department of Agriculture, Food and Nutrition Service (FNS) for approximately 16% of design, development, and implementation costs. The State submitted an Implementation Advance Planning Document Update (IAPDU) to the Centers for Medicare and Medicaid Services (CMS) and FNS on November 21, 2018, requesting additional funding of \$1,323,110 to procure professional services from Nava to support the State's implementation of CPPH1.

On December 19, 2018, FNS granted conditional approval, which does not constitute approval of contract or contract amendment costs for the performance of work under contracts that have not received FNS approval to date.

There is financial risk given the Nava contract amendment was executed without approval of FNS federal financial participation.

State's Planned Risk Strategy: Mitigate

State's Planned Risk Response: While Vermont requested FNS support for this and other IE&E projects, the State FY19 and FY20 was built assuming that we would not receive this funding and that the 16% would need to be covered through state appropriations. This is in large part due to the State's inability to reach common ground with FNS on appropriate cost allocation for projects going forward. If the State does receive FNS approval, it will reduce the amount of State funds we are projected to spend.

Timing of Risk Response: We do not view this as a risk as there is a separate funding stream for this project if FNS does not approve it. State dollars for IE&E projects have historically been appropriated every two years as a part of the capital bill. We have enough state dollars to cover IE spending through the current state fiscal year and expect to receive a capital appropriation for SFY20 and SFY21.

Reviewer's Assessment of State's Planned Response: As long as the appropriate funding is available for Nava's technical services through state appropriations, the State's mitigation strategy is reasonable and acceptable.