Independent Review

Integrated Eligibility Solution (IE) Project

Lessons to be Learned

For the

State of Vermont

Department of Information & Innovation (DII)
And
Agency of Human Services (AHS)
Department for Children and Families (DCF)

Submitted to the
State of Vermont, Office of the CIO
By

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1 Executive Summary

1.1 Background

AHS/DCF is responsible for the operation of ACCESS [Advanced Computer Controlled Essential Services Software] which provides eligibility and case management services to support human service benefits programs for the Economic Services Division (ESD) as well as Child Support Enforcement administration for the Office of Child Support. The ACCESS system is 30+ years old and is slated for replacement over the next several years.

The State has actively pursued the acquisition of a new Integrated Eligibility (IE) solution which would result in the implementation of a fully functional integrated eligibility solution that would allow the State to retire the legacy ACCESS system. The new IE Solution was intended to provide integrated eligibility functionality, currently supported by the legacy ACCESS system, for DCF, ESD and other sister departments within AHS. The new IE Solution would provide support services to existing programs, programs in development, planned solutions, and other future solutions. The IE system was targeted to be built on the existing Health and Human Services Enterprise (HSE) Platform initially implemented to support the Vermont Health Connect (VHC).

The impact(s) and attributes of the project and the Independent Review (in general terms):
- 20 year lifespan of the system
- The initial phase for Integrated Eligibility (IE) and ACCESS Transformation and Decommissioning (AT&D) out to 12/2018 involving 100's of people on the project.
- AHS Departments:
  - Department for Children and Families (DCF)
  - Vermont Department of Health (VDH)
  - Department of Corrections (DOC)
  - Department of Disabilities, Aging and Independent Living (DAIL)
  - Department of Mental Health (DMH)
  - Department of Vermont Health Access (DVHA)
- 43 Programs served out of 12 District offices
- Supplemental Nutrition Assistance Program (SNAP –formerly known as Food stamps) - in Fiscal Year 2013, SNAP provided about $200 million dollars in food benefits to a monthly average of 100,541 people in Vermont according to the USDA
- Non-Medicaid budget of approximately $550M for 2016
- Processes/Functionality/Workflows affected by IE and AT:
  - Eligibility Determination
  - Re-determination
  - Enrollment
  - Denials
  - Appeals and Grievances [Member]
  - Rules processing and Engine
  - Case Management
  - Consent Management*
  - Benefits Management
  - Document Management
  - Financial Management
  - Notification
  - Workflow Management
  - Business Analytics
  - Business Intelligence
  - Integration/Interfaces to Other Programs,
  - Reporting

1.2 The Independent Review

Vermont is required by Statute, Title 3, Chapter 45, §2222(g) to perform an Independent Review (IR) of projects over $1M. As contracted to Coeur Business Group Inc., the scope of the IR was to evaluate:

1. the Agency of Human Services (AHS) IE project;
2. the transition and/or decommissioning of programs from the currently utilized ACCESS system (AT&D);
3. the related Independent Verification and Validation (IV&V) for IE Design, Development, Implementation (DDI).

The audience of the report produced by the IR includes:
- The participating agencies and departments;
- State Chief Information Officer (DII);
- Vermont Legislature;
- Public and Press (by request pursuant to the Public Records Act by way of Vermont Public Records Act or the 'PRA' http://legislature.vermont.gov/statutes/section/01/005/00315).

On February 4, 2016, the State of Vermont Agency of Human Services (AHS) decided to cancel the IE Project Design, Development, and Implementation (DDI) procurement process.

The following was published on 2/4/2016 in a press release on VTDigger.org:

State officials announced this week that Vermont will change course on two major components of a health care information technology suite that were originally planned to interact with technology that backs up Vermont Health Connect.

Human Services Secretary Hal Cohen sent an email to his staff Wednesday announcing that the agency would restart the bidding process on two major IT projects: an integrated eligibility system and core management of the Medicaid Management Information System.

The integrated eligibility system was meant to help Vermonters find out instantly whether they are eligible for one of 42 state benefit programs, such as food stamps or Medicaid.

Coeur Group and others were notified of the cancellation of the procurement.

Due to the cancellation of the IE procurement, Coeur Group is presenting this ***Lessons to be Learned*** report to close out the independent review.

2 Findings and Observations

The IE Solution project was to be responsible for the migration of health and human services programs currently supported by ACCESS. This migration effort was envisioned to contribute toward the final retirement of the ACCESS system to provide support for those programs. Work required on the ACCESS mainframe was to be performed by the State and/or it's designate. The IE Solution Vendor was to be responsible for collaborating with the State and/or its designate regarding program migration, but the IE Solution Vendor was not intended to be responsible for the actual retirement of programs within ACCESS.

The State found itself in a position where it does not have a sufficient number of qualified and experienced systems developer staff to meet current demand for changes specific to the legacy system ACCESS. Therefore, the State had also issued a Request for Proposal (RFP) seeking to obtain high quality, experienced Information Technology (IT) resources which would provide systems analysis, development, design, programming, testing, maintenance, and implementation.

The State has contracted with three vendors as of 12/2015 which can provide needed IT resources. The vendor's systems development staff will work closely with business owners, business analysts, and state technology professionals to ensure good decision making around software development and system support/maintenance to support ACCESS.

2.1 Observations

#	What has worked well?
1	From what the IR Team has observed, the SOV and AHS have made improvements incorporating lessons from Vermont Health Connect.
2	Health and Human Services Enterprise (HSE) has made considerable progress with respect to documenting what are referred to as Enterprise Business Cases (business process maps) for IE.
3	It was observed that collaboration between DII Enterprise Project Management Office (EPMO) and AHS Project Management has resulted in synergies and benefits to the SOV with regard to Project Management.
4	AHS staff has demonstrated excellent knowledge of the domain and operational requirements for the administration of the IE related program areas.
5	The laudable vision of 'The Agency of One' and 'No Wrong Door' will be facilitated by a move towards IE, a self-service model using the web, a self-service portal, and agents equipped to service multiple programs.

#	What has not worked as well?
1	Projects covered under the scope of the IE are complex, have far reaching aspects and impacts beyond the IE IT project. This and the fact that this has not been done before needs to be taken into consideration. For IE, examples include selection and consolidation of the document management system, and the consolidation and reworking call and service centers. One recommendation is to break up the IE project into smaller achievable components. Secondly, where dependencies and perhaps constraints are involved, those items should be reconciled ahead of the larger project.
2	Transactional integration of the IE system with the Oracle - PeopleSoft financial system (Vision) is not supported by the current version of PeopleSoft in use by the SOV. This will require some other internal or outsourced financial system to be used to support the new IE system for the purpose of producing benefit payments. At the current time there are legitimate reasons why this is not the case. The recommendation for the SOV, in alignment with DII's strategic principles is to undertake the necessary steps to upgrade and leverage the Oracle investment with PeopleSoft and Vision.
3	The IE and ACCESS Transformation project(s) have been managed and run by a project management process that relies heavily on consensus of committees and agency leadership. While this type of collaborative style can potentially produce more comprehensive identification of system operation and requirements, it has introduced higher levels of complexity to the process which inevitably results in extended timelines and slower decision making. The recommendation is to move towards a more participative management style which provides the opportunity for available team members to present their ideas and concerns but leaves the actual decision making to a designated individual. This should allow the decisions to be made in a more timely basis.
4	An independent Technical Readiness Assessment (TRA) of the target processing platform for IE was not performed prior to the September, 2014 issuance of the RFP and wasn't completed until December, 2015 with a report released in January, 2016. This introduced a substantial delay in the evaluation of the RFP responses. The SOV should have conducted this assessment prior to, or in parallel with the RFP. Results of the TRA could have more clearly defined the responsibilities of the various parties.
5	With respect to the ratified Project Charter for IE, relevant dates for tasks have experienced slippage and the project Charter has not been updated. The Charter is the foundation for the entire project. The Charter, as part of the overall change management process, needs to be regularly revisited and updated as needed when major changes to the project have occurred. It should be considered a 'living' document. By doing so the (revised) dates, assumptions, and constraints would be revisited and discussed by stakeholders.

#	Other Notable Observations
1	The mainframe hosting ACCESS will not be decommissioned in the near term. Co-hosted in that environment are applications used by the Office of Child Support (OCS), VTRANS (STARS), and the DMV. There are no plans to migrate those programs. While removal of the IE and Human Service programs from the SOV mainframe may provide an opportunity to reduce IBM licensing fees, actual mainframe platform cost savings cannot be accurately estimated at this time.
2	With respect to the previous item, running these mission critical applications on 1980's vintage technology and working to update and enhance functionality for the foreseeable future has not worked well. From the ABC Form: *ACCESS, the current automated eligibility system for health and human service benefit programs, is 30+ years old and requires extensive human resources to function on a day to day basis. It is not easily updated and therefore is frequently out of compliance with federal and state requirements; this can lead to fiscal penalties and sanctions.* Undertaking an approach to implementing IE that leverages current technology was a good plan. Now that the procurement has been cancelled the SOV should pursue similar strategies to move off of the mainframe.
3	Based on the lessons of tropical storm Irene, the Continuity Of Operations (COOP), and a subset of COOP, Disaster Recovery (D/R) testing and restoration plan should be reviewed and tested by a third party.
4	Although approval was imminent, at the time of the IR, it was our understanding that the Optum Disaster Recovery Plan was not yet approved even though the SOV has been hosting VHC and HSE there for almost one year. If this has not yet been completed, the SOV should absolutely complete the approval process as soon as possible.
5	At the time of the IR, coordination between DII and AHS with respect to a common documentation framework like Information Technology Infrastructure Library (ITIL) was unable to be assessed. This would likely affect Service Management, Supplier Management, Service Level Management, and Availability Management**.** The SOV should ensure that documentation for service levels between the various agencies is clear and unambiguous.
6	During staff interviews, it became apparent that the goals and objectives for each portion of the project were not clearly understood. Everyone involved with the IE project should have understood why the project was being undertaken and the Specific, Measurable, Achievable, Results Focused, and Time-bound goals for the project.

3 Lessons to be Learned

#	Requirements Development and RFP Process
1	The State of Vermont has demonstrated a history of delays during administration and processing of RFPs. Going forward, when issuing an RFP, the SOV should be immediately prepared to negotiate a contract and commence with the project. Time lags of one year or more do not benefit any of the parties.
2	With respect to Requirements development, the SOV does an excellent job capturing features and functionality for applications. For IE, though, the team was/is looking to alter the way it does business and services clients. With this in mind, the SOV needs to complete the work in process before issuance of an RFP.
3	As part of the procurement process, Information Security, and especially a Third party risk assessment should be a component of the vendor evaluation. Any findings and risks could then be negotiated between the SOV and any potential vendor(s).

#	Governance and Decision Making
1	The SOV has approached the management of the IE project with an overly collaborative process of establishing requirements, evaluating business processes, and decision making. While collaborative processes provide a more comprehensive documentation of system requirements and build "buy in" it can lead to delays. The recommendation is to have firm and demonstrable criteria and requirements with respect to the 'end state' before engaging vendors/partners with respect to a specific solution.
2	The SOV should consider establishing a project role of Solutions Architect with the skills and capabilities to function at a strategic level while having a high level of domain knowledge. This could be accomplished be expanding the role of Business Analyst. With the current Oracle stack including the PeopleSoft suite, Siebel, and Oracle Identity Management this makes sense given the product overlap, flow of information, and common tasks that each Agency performs. Examples are Project and Portfolio Management, and Procurement.

#	Project Management
1	The SOV needs to "*Improve requirements and scope management processes to ensure project phases are reasonable and achievable.*" This lesson, identified in "Release 1 Lessons Learned Report" by Berry Dunn– 3/27/2014, is also noted here by Coeur Group.

#	System Development Methodology
1	Where multiple approaches and methodologies are involved for IE, such as the National Human Services Interoperability Architecture (NHSIA) and the Medicaid Information Technology Architecture (MITA), it is recommended that the SOV rationalize and standardize those requirements into one unified set of Project requirements.
2	The SOV should approach large scale enterprise system implementations with a much more modular approach. The scope of the IE project was extremely large with nearly 40 individual program support components identified for implementation on top of the eligibility function.
3	With the IE project, the SOV has made a decision and commitment to use a Commercial Off the Shelf (COTS) solution to satisfy the requirements of IE and associated program management and administration. Using a COTS solutions successfully, requires the adaptation of business practices to align with the capabilities and limitations of the selected solution, often referred to as a fit/gap analysis. Fit/gap should be performed by Subject Matter Experts,

	and the SOV or their agents or third parties.
#	**People and Staffing**
1	The SOV needs to internally build key shills for the hosting platform to provide at least a solid understanding of the capabilities and workings of the platform and the attendant Oracle solutions in order to provide application administration and minimal development and support for those applications that are hosted. These should include but are not limited to Master Data Management, web services development and support, workflow and business rules development and support, systems integration and interfacing. This could take the form of a Center of Excellence that would offer those services to all agencies across the SOV.
2	SOV should adopt leading practices for Change Control and Change Management. This should be implemented as a centralized statewide function within the SOV and should: • Create a clear vision for the SOV • Work to establish strong project governance and leadership • Maintain consistent project management structure • Reduce conflicting resource demands • Establish effective communications approach • Security strategy • Reporting strategy • Culture and history

4 Report Acceptance

The electronic signatures below represent the acceptance of this document as the final completed Lessons Learned document submitted in place of a final Independent Review Report.

_____   _____

DII Oversight Project Manager   **Date**

_____   _____

State of Vermont Chief Information Officer   **Date**