



North Carolina Department of Health and Human Services

Pat McCrory
Governor

Aldona Z. Wos, M.D.
Ambassador (Ret.)
Secretary DHHS

Adam Sholar
Legislative Counsel
Director of Government Affairs

January 15, 2014

SENT VIA ELECTRONIC MAIL

The Honorable Ralph Hise, Chair
Joint Legislative Oversight Committee on
Health and Human Services
NC Senate
Room 1026, Legislative Building
Raleigh, NC 27601-2808

The Honorable Mark Hollo, Chair
Joint Legislative Oversight Committee on Health
and Human Services
NC House of Representatives
Room 639, Legislative Office Building
Raleigh, NC 27603-5925

The Honorable Justin Burr, Chair
Joint Legislative Oversight Committee on
Health and Human Services
NC House of Representatives
Room 307A, Legislative Office Building
Raleigh, NC 27603-5925

Dear Senator Hise and Representatives Hollo and Burr:

Section 12A.4.(g)(4) of Session Law 2013-360 requires the North Carolina Department of Health and Human Services to submit, by no later than January 15, 2014, an MMIS System Certification Plan Preliminary Report. The attached report fulfills this requirement.

If you have any questions or need additional information regarding this report, please contact Ed Riley at (919) 647-8326.

Sincerely,

Adam Sholar

cc: Joseph Cooper, Jr. Susan Jacobs Brandon Greife
Jim Slate Patricia Porter Pam Kilpatrick

www.ncdhhs.gov

Tel 919-855-4800 • Fax 919-715-4645

Location: Adams Building/Dix Campus • 101 Blair Drive • Raleigh, NC 27603

Mailing Address: 2001 Mail Service Center • Raleigh, NC 27699-2001

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Rod Davis
Angeline Sligh
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SENT VIA ELECTRONIC MAIL

The Honorable Jason Saine, Co-Chair
Joint Legislative Oversight Committee on
Information Technology
NC House of Representatives
Room 402, Legislative Office Building
Raleigh, NC 27603-1096

The Honorable Andrew Brock, Co-Chair
Joint Legislative Oversight Committee on
Information Technology
NC Senate
Room 623, Legislative Office Building
Raleigh, NC 27603-5925

Dear Senator Brock and Representative Saine:

Section 12A.4.(g)(4) of Session Law 2013-360 requires the North Carolina Department of Health and Human Services to submit, by no later than January 15, 2014, an MMIS System Certification Plan Preliminary Report. The attached report fulfills this requirement.

If you have any questions or need additional information regarding this report, please contact Ed Riley at (919) 647-8326.

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SENT VIA ELECTRONIC MAIL

Mr. Mark Trogdon, Director
Fiscal Research Division
North Carolina General Assembly
Room 619, Legislative Office Building
Raleigh, NC 27603-5925

Dear Director Trogdon:

Section 12A.4.(g)(4) of Session Law 2013-360 requires the North Carolina Department of Health and Human Services to submit, by no later than January 15, 2014, an MMIS System Certification Plan Preliminary Report. The attached report fulfills this requirement.

If you have any questions or need additional information regarding this report, please contact Ed Riley at (919) 647-8326.

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Legislative Counsel
Director of Government Affairs

January 15, 2014

SENT VIA ELECTRONIC MAIL

Mr. Art Pope
State Budget Director
Office of State Budget and Management
Room 5200, Administration Building
Raleigh, NC 27603-8005

Dear Director Pope:

Section 12A.4.(g)(4) of Session Law 2013-360 requires the North Carolina Department of Health and Human Services to submit, by no later than January 15, 2014, an MMIS System Certification Plan Preliminary Report. The attached report fulfills this requirement.

If you have any questions or need additional information regarding this report, please contact Ed Riley at (919) 647-8326.

Sincerely,

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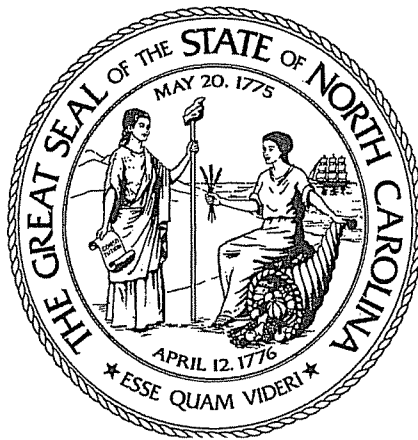
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**SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT
MEDICAID MANAGEMENT INFORMATION SYSTEM (MMIS)
SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT TO THE
NORTH CAROLINA GENERAL ASSEMBLY**



**STATE OF NORTH CAROLINA
DEPARTMENT OF HEALTH AND HUMAN SERVICES**

January 15, 2014



DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

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DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

TABLE OF CONTENTS

A. INTRODUCTION	6
B. CMS MMIS CERTIFICATION PROCESS DESCRIPTION	7
C. DETAILED TIMELINE	8
D. ISSUES THAT COULD IMPACT THE TIMING OF SYSTEM CERTIFICATION AND PLANS TO MITIGATE IDENTIFIED ISSUES.....	21
E. COSTS ASSOCIATED WITH SYSTEM CERTIFICATION.....	23
F. IDENTIFIED FUNDING SOURCES TO PAY FOR COSTS ASSOCIATED WITH SYSTEM CERTIFICATION	24



DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

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DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

A. INTRODUCTION

In July 2013, the NC General Assembly passed Session Law 2013-360, Senate Bill 402, "The Appropriations Act of 2013", of which Section 12.4.(g)(4) required the Secretary of the Department of Health and Human Services to provide, no later than January 15, 2014, the Joint Legislative Oversight Committee on Health and Human Services, the Joint Legislative Oversight Committee on Information Technology, the Fiscal Research Division, and the Office of State Budget and Management with a preliminary report on the Department's plan for achieving system certification of the Replacement MMIS. The following are to be addressed in the report:

- a) "A description of the process.
- b) A detailed time line.
- c) Any issues that could impact the timing of system certification and plans to mitigate identified issues.
- d) Any costs associated with system certification.
- e) Any identified funding sources to pay for costs associated with system certification."

In compliance with this legislation, these items are addressed below. Please note that the information provided in this report is current as of December 31, 2013.

B. CMS MMIS CERTIFICATION PROCESS DESCRIPTION

The *CMS Certification Review Protocol* is used by CMS to determine whether a state's MMIS meets all Federal requirements and, therefore, is certified and eligible for enhanced federal financial participation (FFP) for MMIS operations.

The state reviews all of the Medicaid Enterprise Certification Toolkit (MECT) certification checklists and determines which may apply. Since most checklist criteria are mandatory requirements for a Medicaid agency, these must be supported by the MMIS.

The certification process begins with readiness functions, including the tailoring of checklists to ensure all review criteria are included, the applicable MECT checklists are completed and the necessary artifacts have been collected/validated.

One of the main pre-certification activities is the submission of MECT certification checklists to the CMS Regional Office (RO). The purpose of this pre-review, to be scheduled by the CMS RO in the case of the State of North Carolina, is to improve the communication and understanding between the State and the RO regarding characteristics of the new MMIS.



DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

The CMS RO reviews the checklists to ensure all business objectives have been properly annotated. The state then schedules and holds a conference call with the CMS representative to get CMS' findings and feedback.

The formal request for certification is followed by the CMS acknowledgement and the setting of the date-of-certification site visit along with the specifications of the data needs list. Prior to the site visit, there is a pre-certification meeting which includes executive management. The state provides the requested data and reports which reflect that the MMIS meets all the required criteria. This on-site event includes an entrance conference, the evaluation of the MMIS through interviews, review of artifacts, and hands-on functionality demonstrations.

Upon the conclusion of the site-visit, CMS concludes the analysis of the data, documents the resolution of any identified issues, and provides the formal certification decision and report to the state.

C. DETAILED TIMELINE

Replacement Medicaid Management Information System (MMIS) System Certification Detailed Timeline			
Tasks	Start Date	End Date	Details/Comments
CMS Criteria/Checklist Assessment	2/1/2013	3/1/2013	
Assess checklist criteria	2/1/2013	4/1/2013	Follow-ups to finalize initial assessment of checklists.
Initial Artifact Collection and Assessment	2/1/2013	10/1/2013	This task reflects collecting artifacts for proof of concept utilizing the provider checklist. The task for the continuation of collecting production artifacts is reflected under the task "Process All Remaining Checklists" below.
Proof of Concept - Artifact Collection	2/1/2013	10/1/2013	Provider (CSC - only)



DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

Replacement Medicaid Management Information System (MMIS) System Certification Detailed Timeline			
Tasks	Start Date	End Date	Details/Comments
Artifact Collection	3/11/2013	9/15/2013	Continue artifact collection in working spreadsheet. 5/29/2013 - Continue artifact collection and document artifacts in MECT checklist.
Artifact Collection	3/18/2013	9/22/2013	Complete artifact collection in working spreadsheet. 5/29/2013 - Complete artifact collection from checklist and add to appropriate folder on Sharenet.
Artifact Collection	3/21/2013	9/22/2013	Gather data from late responders in working spreadsheet.
Artifact Collection	3/21/2013	10/1/2013	Meet with team to review final set of artifacts.
Artifact Collection	3/22/2013	6/14/2013	Finalization of checklist - transfer from spreadsheet to checklist. 5/21/2013 - Checklist will reflect that all Business Rules are mapped to MECT checklist requirements and reflect any State-specific requirements. For items marked "no" an explanation will be supplied in the comment field.
Artifact Collection	3/27/2013	6/14/2013	Review checklist and adjudicate comments.



DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

Replacement Medicaid Management Information System (MMIS) System Certification Detailed Timeline			
Tasks	Start Date	End Date	Details/Comments
Initial Artifact Collection and Folder Prep	3/4/2013	6/28/2013	CSC and State - 4 month period for initial collection and validation of artifacts. 5/21/2013 - artifacts are collected before and 6 months after go-live to demonstrate reports for that time period.
Final CMS Certification Package Preparation	5/13/2013	1/17/2014	Finalization of the package for submission with certification request letter.
Activities Prior to Go-Live	5/29/2013	8/15/2013	
Verify MECT checklists against Program requirements/business objectives	5/29/2013	6/14/2013	Verify that RFP requirements are mapped to MECT checklist. Any requirements that are not mapped need to either become a State-specific requirement or mapped to appropriate checklist. Any checklist requirement not mapped needs to be evaluated for reason. CSC/State activity.



DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

Replacement Medicaid Management Information System (MMIS) System Certification Detailed Timeline			
Tasks	Start Date	End Date	Details/Comments
Review Truven's RFP/requirements to MECT checklist	6/7/2013	6/14/2013	A meeting is scheduled for Truven to review their mapping of requirements to the MECT checklist on 6/7/2013. This information will be included in the final MECT checklist by 6/14/2013.
Submit white paper for pre and post go live activities	6/17/2013	6/17/2013	E. Reed - distribute white paper to executive team describing pre and post go-live activities.
Provide Overall Status (checklist/artifact change)	6/18/2013	6/18/2013	Touchpoint meeting between CSC and OMMISS - the review will include any new requirement findings and overview of verification process for mapping RFP requirements to MECT checklist.
Review by Business Associates(BAs)/Leads verifying the remainder mapping is assigned to appropriate checklist requirement	6/18/2013	7/31/2013	The BAs/Leads will receive the mapping information for the remainder of RFP requirements mapped to the MECT checklist requirement. Verification is needed to ensure accurate mapping was performed. New requirements captured during the DDI phase are also included. This task includes instructions for the



DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

Replacement Medicaid Management Information System (MMIS) System Certification Detailed Timeline			
Tasks	Start Date	End Date	Details/Comments
			verification process.
Review final completed checklists with State	6/27/2013	8/15/2013	The feedback received from the peer review will be incorporated into the final checklists.
Call with CMS Regional Office (RO)	6/3/2013	6/28/2013	Touchpoint meeting with RO to discuss implementation of new system. State activity and CSC participated on call.
Identify artifacts that need to be collected for go-live	6/7/2013	6/22/2013	A list of artifacts to be completed by day one verified by State and CMS.
Assemble team and distribute list of identified artifacts that need collected day one	6/25/2013	6/28/2013	The list of artifacts required for day one will be communicated to the appropriate BA.
Operational readiness activities completed per acceptance Criteria	6/28/2013	6/28/2013	Operationally ready.
Process All Remaining Checklists	9/27/2013	1/17/2014	CSC's date to have artifacts collected for the MECT checklists; the State will then validate.
Distribute Remaining CMS Certification Checklists to BAs	6/25/2013	9/4/2013	Initial distribution to BAs and Tech Leads 5/29/2013 - The new checklists with both Federal and State-specific requirements are distributed to CSC/State leads.
Provide overview of data collection needs	7/24/2013	9/4/2013	Presentation to Subject Matter



DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

Replacement Medicaid Management Information System (MMIS) System Certification Detailed Timeline			
Tasks	Start Date	End Date	Details/Comments
			Experts(SMEs)/Leads outlining artifact collection process.
Identify and collect Checklist Artifacts	9/27/2013	1/2/2014	BAs identify artifacts and collection starts.
Perform Quality Assurance (QA) of artifacts to ensure accuracy in supporting requirements	10/16/2013	1/17/2014	Initial QA on artifacts to verify process reported supports checklist requirement. Also verifies that reports are accessible. Additional QA activities may apply. CSC/State participation.
Provide Overall Status with OMMISS	10/31/2013	10/31/2013	Touchpoint meeting between CSC and OMMISS.
Meet with CSC and OMMISS to review collected artifacts and resolve issues identified by E. Reed	9/27/2013	1/2/2014	Schedule meetings to review collected artifacts. Follow-ups, rework, and re-review of collected artifacts. 1/2/2014 is the date of the first round of collection.
Review and update Inventory List/Burndown Chart	11/18/2013	1/2/2014	Inventory list is used to track the artifacts, narratives, completion and other data lists for CMS certification. Burndown chart is used to provide metrics.
Ongoing impact reviews and artifact collection	7/1/2013	4/30/2014	Maintenance work to update artifacts with any changed functionality.
Manage deferred items	7/1/2013	4/30/2014	Review Change Service Request



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SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

Replacement Medicaid Management Information System (MMIS) System Certification Detailed Timeline			
Tasks	Start Date	End Date	Details/Comments
			(CSR) 139 for any impacted changes to MMIS certification. CSR 139 tracks deferred items. Reed/State activity.
Continue collection of artifacts	1/2/2014	4/30/2014	New artifacts may be created or changed, however the primary artifacts should be collected by the 1/2/2014, which is the earliest date certification can begin. CSC/ State activity.
Final QA review	1/20/14	4/30/2014	QA new artifacts implemented for production processes.
MMIS Certification	6/3/2013	7/1/2014	State's requested certification date is May 2014; however, contractually, CSC must apply its best efforts to obtain CMS certification within one year from go live, which is 7/1/2014.
MMIS Certification Start	6/3/2013	6/3/2013	
Post Implementation Assessment	6/3/2013	7/1/2014	
Create Certification Package for Go-Live (Prepare presentation, document steps to take place for the Post-Implementation Assessment and review by the CMS)	6/3/2013	8/2/2013	Prepare presentation, document steps to take place for the Post-Implementation Assessment and review by the CMS Certification SME.



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INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

Replacement Medicaid Management Information System (MMIS) System Certification Detailed Timeline			
Tasks	Start Date	End Date	Details/Comments
Certification SME)			
Review System with Certification Checklist	7/1/2013	7/1/2014	Collect and validate production solution artifacts. CSC/State activity.
Review completed checklists with RO	9/20/2013	12/2/2013	The RO will review the checklists to make sure that all of the criteria derived from Federal requirements have been checked "Yes" and that all of the capabilities that the State planned to develop, as defined in the APD and approved RFP, have been delivered. State leads activity and CSC participates.
Submit Certification Request	1/2/2014	1/17/2014	Submit request following validation of artifacts. Milestone.
CMS Review Certification Request	1/17/2014	4/10/2014	CMS has 60 days to review request for certification and provide response.
Receive Acceptance Date for Certification Review	1/17//2014	4/10/2014	Official date for certification review received from CMS within 60 days of sent request.
Provide system access to CMS reviewers	4/1/2014	7/1/2014	CMS will need access to NCTracks, Report 2 Web, FileNet and SILK tools.
Provide Training of MMIS System to CMS reviewers and Artifact	4/1/2014	7/1/2014	CMS reviewers need training on the MMIS System and tools used



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Tasks	Start Date	End Date	Details/Comments
Overview			for the review. CSC/State activity. Provide overview on artifacts collected and inventory list. Dates are good provided CMS does not delay the certification date.
Kickoff presentation for CMS	5/1/2014	7/1/2014	Provide NCTracks overview and highlights. CSC/State activity. One day activity to occur on day one of certification date.
Final Folder Prep - Production Artifact Remediation	4/1/2014	5/14/2014	Remediate any issues/gaps.
Internal mock interviews/coaching with CSC/State leads	1/13/2014	4/14/2014	Prepare SMEs/Leads for the CMS certification.
Support Auditors	4/1/2014	7/1/2014	Provide support to the State for pre-certification meeting for final certification. End Date is dependent upon CMS certification date being finalized.
Final Day of Certification Review - Closing Remarks with CMS and State	5/30/2014	5/30/2014	Preparation for closing day remarks and activities. State activity. Dates are milestones based on the State's May 2014 requested certification date.
Receive Certification from CMS	5/1/2014	7/1/2014	This is a date range between the State's requested May 2014 CMS certification



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Replacement Medicaid Management Information System (MMIS) System Certification Detailed Timeline			
Tasks	Start Date	End Date	Details/Comments
			target date and the July 1, 2014 CMS certification date that CSC must contractually apply its best efforts to achieve.
MMIS Certification Complete	5/1/2014	7/1/2014	Targeted certification dates, see section D below.

D. ISSUES THAT COULD IMPACT THE TIMING OF SYSTEM CERTIFICATION AND PLANS TO MITIGATE IDENTIFIED ISSUES

The State's target date to receive CMS system certification for NCTracks is May 2014. This date is dependent upon CMS's response to the State's requested certification date. The date for actual certification is determined by CMS and may be later than May 2014, as it is dependent upon CMS reviewer schedules. There are a number of activities currently taking place in preparation for CMS system certification, such as finalizing the MECT checklists, collecting artifacts to substantiate compliance with certification requirements, and conducting ongoing certification review sessions with each prospective certification business area. Eighteen checklists have been selected for certification review.

Analysis of all existing defects and Customer Service Requests (CSRs), for the identification of possible impacts to certification, is to be completed by the end of November 2013. This analysis will provide a comprehensive overview that will be utilized to prioritize the implementation of CSRs. The completion timelines of all noted system defects are being monitored. The objective of the analysis is to provide outcomes that can be managed and monitored for timeliness to mitigate adverse impacts to certification.

Artifact collection for each identified MECT requirement is scheduled to be completed by January 2, 2014. A matrix, stored on ShareNet, was created to provide transparency for assignments and for tracking completion of the artifacts. Once the artifact set for a requirement is completed, it moves to Quality Assurance (QA). The review, QA, and validation of artifacts will be completed by the CMS certification lead and State business area owners. The plan allows for sufficient time to complete any necessary cleanup work by March 2014.

The State anticipates that it will be able to submit the system certification request to CMS in January 2014. The certification request letter will include a declaration that the



DEPARTMENT OF HEALTH AND HUMAN SERVICES
SL 2013-360, SECTION 12A.4.(G)(4) REPLACEMENT MEDICAID MANAGEMENT
INFORMATION SYSTEM (MMIS) SYSTEM CERTIFICATION PLAN PRELIMINARY REPORT

State's MMIS meets all legal and regulatory requirements, a copy of the official acceptance letter from the State to the MMIS contractor, the date the system became fully operational, and the suggested date or timeframe the State desires to undergo the onsite visit, which has been determined to be prior to the beginning of State Fiscal Year 2014. By January 7, 2014, the State and CSC will have completed the analysis to determine whether May 2014 is a feasible timeframe for certification.

E. COSTS ASSOCIATED WITH SYSTEM CERTIFICATION

Although there is a small team of specialists at OMMISS dedicated to achieving CMS certification, many other DHHS staff will be working on activities leading up to CMS certification. At this time, the salary and benefit costs related to DHHS staff are expected to be \$340,000 during SFY 2013 - 2014 and \$25,000 during SFY 2014 - 2015.

There are no additional vendor (CSC) costs associated with Federal certification; rather, the cost was included in the baseline fixed price for the development of NCTracks. Below is an excerpt from the Replacement MMIS Contract which describes the vendor's certification responsibilities:

"The Vendor shall apply its best efforts in assisting the State to achieve Federal certification approval for the maximum allowable enhanced FFP for the Replacement MMIS within one (1) year of the Operational Start Date, as well as to obtain approval of FFP retroactively to the Operational Start Date. In addition, the Vendor shall apply its best efforts to assist the State in maintaining Federal certification approval for the maximum allowable enhanced FFP for the Replacement MMIS throughout the life of the Contract.

Should certification fail to be achieved within one (1) year of the Operational Start Date, the Vendor shall be liable for damages to the extent they result from its actions or inactions relating to the lack of certification. Should certification fail to be approved retroactively to the Operational Start Date, the Vendor shall be liable for any damages resulting from its actions or inactions relating to the loss of maximum allowable enhanced FFP. Should de-certification of the Replacement MMIS, or any component part of it, occur prior to Contract termination, the Vendor shall be liable for any damages resulting from its actions or inactions relating to the de-certification and loss of maximum allowable enhanced FFP."

F. IDENTIFIED FUNDING SOURCES TO PAY FOR COSTS ASSOCIATED WITH SYSTEM CERTIFICATION

Payments to DHHS staff for certification activities were included in OMMISS's biennium budget and approved in Section 12A.4.(a) of the Session 2013 Budget Bill. No additional funding is expected for CMS certification.

End of Report