MMIS Certification: Lessons Learned and Looking Ahead

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Disconnect Between What the Agency Needs and What It Asks For

Obsolete requirements and methods still influence today’s RFPs

Beginning
Design, Develop, Implement, Operate Custom Solution

Middle
Operate, Enhance, Expand, Custom Solution

Today
Replace Custom with Commercial Solution

Misalignment affects certification by adding time, complexity, cost and risk
Requirements vs. Features and Functionalities

User-defined Needs + Contractor-defined Design = State-specific MMIS

Requirements – tell the market what to design and develop
Requirements vs. Features and Functionalities

Features and Functionalities – tell the market what to support and deploy
Changing the DD&I Vernacular – More Than Words

<table>
<thead>
<tr>
<th>Analyze</th>
<th>Design</th>
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<tbody>
<tr>
<td>• Analyze MECT objectives and system review criteria, link to solution</td>
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<tr>
<td>• Analyze gaps, link to product roadmap</td>
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<tr>
<td>• Analyze existing business processes and rules, link to replacement MMIS</td>
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<tr>
<th>Configure</th>
<th>Develop</th>
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<td>• Configure business rules</td>
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<tr>
<td>• Migrate and test data in new configurations</td>
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<tr>
<td>• Establish configuration change process</td>
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<th>Deploy</th>
<th>Implement</th>
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<tr>
<td>• Train users how to perform business processes</td>
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<tr>
<td>• Keep technical complexity away from business users</td>
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<td>• Deploy incrementally, eliminate the big bang</td>
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Seven Conditions to Incorporate in the RFP and Certification Planning

- **Modularity** – SOA, open interfaces, configurable business rules, formal SDLC
- **MITA** – business-driven, process-centric, roadmap for greater maturity
- **Industry Standards** – information, business process, technology, methodologies
- **Leverage** – reuse, alternate delivery models, extensibility, expandability
- **Business Results** – workflow, dashboards, service, performance
- **Reporting** – on-demand, multi-purpose, transparency, accountability
- **Interoperability** – seamless interaction, efficient customer experiences, exchanges
Best Practices for Connecting What the Agency Needs and What It Asks For

1. Share the agency’s vision, strategy and goals
2. Link outcomes desired to performance required
3. Write the scope of work for a commercial solution
4. Commit to zero customization
5. Integrate the Seven Conditions into the business objectives and scope of work
6. Use the MECT checklists for multiple purposes
   - Obtain a description of the solution
   - Determine out of the box functionality
   - Understand product roadmap
   - Trace system review criteria (SRC) to proposed and deployed solution
   - Link SRC to data, reports and artifacts early and as they become available
Maine Integrated Health Management Solution

How to Prepare for a Successful CMS Certification Experience

MESConference Presentation

Jennifer Palow, State of Maine Project Manager
Ed Daranyi, IV&V Project Manager

Tuesday
August 21, 2012
10:00 a.m. – 11:00 a.m.
Presentation Overview

1. State of Maine MMIS Project Overview
2. Establish a Certification “Culture” on the MMIS Project
3. State-Specific Checklist Items
4. Traceability to the Checklist
5. Evidence of Compliance to Checklist
6. When to Send the Readiness Letter?
7. Simulations and Preparing Materials
8. Final Preparations: Setting Your Agenda
State of Maine MMIS Project Overview

Oct 2007
• RFP out

Feb 2008
• Unisys (Molina) awarded FA services contract
• BerryDunn awarded IV&V contract
• Design, development, configuration, and testing began

Sept 2010
• System implemented

Sept 2011
• CMS onsite review

Dec 2011
• CMS Certification Letter received by the State
Establish a CMS Certification “Culture” on the MMIS Project

- Leadership buy-in to include CMS Certification activities from the start of the project is vital.
- Establish a project manager who is responsible for certification from the start.
- Achieving a certified system should be considered a goal of the project.
- Provide certification “training” throughout the contract to orient State and Fiscal Agent staff to the CMS certification process.
- All staff using the new system should participate in monthly meetings. Be consistent with messaging and documentation.
Establish a CMS Certification “Culture” on the MMIS Project – continued…

☒ Develop a clear plan of how and who will document the system for Certification.

☒ Socialize that plan and educate your team throughout the project—beginning, middle, and end—to accommodate staff turnover and changes in staff due to the project life cycle.

☒ Consult with your Regional Officer regularly. Include them in your planning efforts. They can support your approach and help answer questions you may have.
Traceability to the Checklist

Requirements Validation and Identification
Map MMIS contract requirements to the Checklist

DDI Effort and when Making Scope/Requirements Changes
Use the traceability to the Checklist to inform these decisions

Testing Phases
Consider tracing test scripts and results so they also map to the Checklist

Completed RTM
Leverage the completed RTM to prepare evidence of compliance to the CMS Checklist
# State-Specific Checklist Items

State-specific items are additional state-related requirements contained in the RFP and APD that are not found on the MECT checklist.

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<th>State-Specific Checklist Items</th>
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<td>- Use your APD and RFP to assist in making sure items that are unique to your state are identified.</td>
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<tr>
<td>- Roll-up the state-specific requirements into high level items.</td>
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<tr>
<td>- While going through the exercise of identifying state-specific requirements, also identify non-applicable MECT checklist requirements.</td>
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<tr>
<td>- Review state-specific and N/A items with the CMS regional office to get a sense of whether they are acceptable.</td>
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Evidence of Compliance to the Checklist

• Use the RTM and Operational Readiness Test
• Maine’s “System Review Criteria” approach
• Supporting Documentation
  ✓ Reports (Day 1 to present)
  ✓ System diagrams
  ✓ State self-assessment
  ✓ Desk level procedures
  ✓ System and project plan documentation
When to Send the Certification Readiness Letter

• **Send the letter when you are ready**—have all materials demonstrating evidence ready to go. Avoid saving work for the time in between the letter request and the onsite review.

• Be prepared with an internal list of known issues; anticipate what the findings could be.

• Be prepared to send CMS materials in advance of the onsite review and after the review.

• Establish clear expectations for the Fiscal Agent vendor’s participation in the remaining certification-related work.
Simulations and Finalizing Review Materials

• **Practice like it is the real thing**—even down to how you will record questions and requests being asked by CMS reviewers.

• Doing dry-runs of the presentations and re-reviewing your materials will help confirm that you are ready and uncover any final preparations required for the CMS review.

• The simulation will help ease your presenter’s fears and jitters.

• The more responsive you can be during the onsite visit and review, the better.

• Confirm that you have your resources available for the onsite CMS review—even if these resources are not presenting, they may need to be available to respond to requests and questions.
Final Preparations: Setting Your Agenda

• Schedule the time for the one week onsite visit down to the ½ hour.

• Reserve space for the CMS review team to use so they can meet in private.

• Provide work stations for each reviewer.

• Confirm that resources who may be required to support the State team are ready, available, and “on call.”

• Remember that this is a time to show off your system and showcase all the hard work the DDI teams have performed to implement the system. Thank all those involved and have fun!
Questions and Discussion

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Medicaid Management Information System Certification – Lessons Learned

Presented by: Sonny Munter- CIO, Georgia Department of Community Health
Agenda

- Georgia’s Certification Experience
- Money / Time
- MMIS Implementation Considerations
- Fatigue
- Certification Preparation
- Certification Team
- CMS Notification
- Certification Facility
- Questions?
Georgia’s Certification Experience

• The new Georgia Medicaid Management Information System went live November 1, 2010
• Certification efforts began immediately following the 90 day Warranty / Joint Triage Team meetings
• CMS Certification team arrived November 14, 2011 and exited November 18, 2011
• NO FINDINGS!
• GAMMIS was certified back to the first day of Go Live – November 1, 2010
• CMS Approval letter received March 2012 (4 month delay)
Money / Time

  - 50% Federal Financial Participation (FFP)
  - 50% State Funds
- Once Certified
  - 75% FFP
  - 25% State
  - Back to date of certification (may not be the Conversion date)
- Time is money!
MMIS Implementation Considerations

• Insure you have someone on your State implementation team who is **VERY** familiar with the Certification Checklists.

• Insure the MMIS requirements are closely associated with the CMS Certification Checklist to insure that the system is *designed with the Checklists in mind*.

• Before moving a requirement to post implementation insure the requirement is *not* necessary for Certification.
MMIS Implementation Considerations (Cont’d)

- Consider Certification criteria during requirement traceability.
- Claims processing is very important during the CMS interview:
  - Design
  - Construction
  - System Integration Testing
  - User Acceptance Testing
- Reference the Certification Checklists often during DDI
- Document all project decisions regarding Certification
Fatigue

• MMIS implementation is difficult, takes a long time and is very stressful for the staff 😞

• **Celebrate the successful implementation**

• The last thing the staff wants is another demanding project.

• **Certification is demanding**
  – Be considerate of your staff
Certification Preparation

• Select a Knowledgeable Project Manager
  – Experienced leading Certification efforts
  – Works with someone who is experienced (Possibly from the MMIS Vendor) – *Costs need to be considered*
  – Has reviewed and is “thoroughly” knowledgeable of the Certification Checklists

• Kick-off meeting
  – Who should attend *(Critical that Business People understand their role)*
  – *Attendance is required* – May impact other initiatives
Certification Preparation

• MMIS Operational Support
  – Keep in mind that you just went live with a new MMIS
  – Lots of Member and Provider inquiries
  – SMEs will have to:
    • Support Production Operations
      – *There will be defects!*
    • Participate in Certification Checklist development
    • Participate in the CMS review meetings
    • Participate in other projects (Exchange / Eligibility)
Certification Preparation

• Weekly Meetings
  – Conduct Kick Off meeting
  – Conduct Training Sessions
  – Develop Risks and track throughout the project
  – Track Issues / Action Items
    • Require prompt resolution
  – Document and respond timely to questions/concerns
  – Provide timely feedback *Time is money!*
Certification Team

• Make sure the Team is made up of your *best Subject Matter Experts* from each of the Functional Areas

• Hire a season consultant who has “Successfully” helped other States become certified

• Involve your Regional CMS team *Review and Advice*
Certification Team

• *Practice, Practice, Practice - Dry Runs!*
CMS Notification

- Must have two quarters of data post go live
- Write a letter to CMS requesting a specific time for Certification
  - Make sure you are 100% ready
- Schedule the CMS review team as soon as possible
  - 50/50 FFP/State Split until the MMIS is certified
  - State Financial Distress – *Time is Money!*
  - Other States will be competing for the same CMS Certification Review Team
- Schedule preliminary CMS conference calls
  - Determine areas that can be reviewed by CMS via WebEx
  - Insure SMEs are present to answer questions
Certification Facility

• If using a Fiscal Agent
  – Schedule the meetings at the Fiscal Agent’s facility
  – Provide a tour of the facility including the data center
  – Insure all security procedures are followed during certification
    • CMS and Agency staff must log in and log out each day
    • Visitor badges must be provided, worn and visible
    • CMS staff must be escorted at all times while in the building
      – Including Bathroom breaks 😊
    • No “Tailgating” through doors
Certification Facility

• Provide snacks, soda, water for CMS and the State Staff
• Schedule Breaks and Lunch
• Conduct nightly review meetings with CMS
  – Take notes
  – Respond to questions or concerns quickly
• Designate a work area for the CMS team
• *Plan for long days!*
Certification Facility

- Designate an area where SMEs can work when not involved in a certification review meeting

- Anticipate a week for the review

- Conduct an “Exit Meeting” with CMS, the MMIS vendor and the State Staff
Questions?