



### TAB 4D: APPROACH TO CERTIFICATION

The components that make up our MMIS solution are selected and constructed to lead to certification straight out of the box. The combination of our Medicaid certification experience, documented methodology and processes, and certifiable-ready systems help provide Iowa with a low-risk Certification process.

4.3.4.5 Approach to Certification (Label as Tab 4D in your submission) Behind Tab 4D, the bidder is directed to describe how their proposed solution will meet Certification Phase responsibilities as provided in Section 2.8 of the RFP, in accordance with the instructions in Section 4.3.4.1.

One of the most critical objectives of the Iowa Medicaid Enterprise (IME) solution is to receive maximum Federal Financial Participation (FFP) through Certification of the MMIS. We have reviewed and mapped the federal Medicaid Enterprise Certification Toolkit (MECT) and Agency-specific criteria for each business area to the Accenture Public Health Platform (APHP) and provided an explanation of how each requirement is or will be met. Delivering a service-oriented architecture (SOA)-based, Medicaid Information Technology Architecture (MITA)-aligned, certifiable MMIS to serve the State and its citizens puts Iowa on a path toward improving the quality of health and healthcare of its citizens. APHP offers this, as well as transparency into the rules, processes, workflows and data within the system. Taken together, APHP enables the Agency to serve your clients today and provides a tool to pursue continuous improvement in systems and services.



The IME Receives an MMIS that will Qualify for the Highest Eligible Rate for Federal Financial Participation (FFP) Retroactive to the First Day of Operations.

- Validation of Accenture Public Health Platform (APHP) and its Component Products against MECT and mapping to MITA 3.0
- Supports the recently published "Enhanced Funding Requirements: Seven Conditions and Standards"
- Proven industry expertise in the form of SMEs with intimate knowledge of the MMIS certification process

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We acknowledge and accept the 2.8, Certification Phase Scope of Work (SOW) elements and requirements. Our proposed approach summarized below meets each RFP and contractor requirement.

For each Attachment L requirement narrative response we provide a cross reference of the requirement number and the page of the matrix provided in Tab 4G: Worksheets for Submission.

#### 2.8 Certification Phase

The new MMIS must meet CMS certification requirements for enhanced federal funding. The Contractor's complete system solution shall include the MMIS modules, interfaces, and infrastructure identified in Attachment K – Technical Specifications Matrix.

The Agency and CMS are currently engaged in a certification transformation process through which the traditional certification process is being updated to become an iterative process. The successful Contractor shall become a part of this new rollout of the updated certification process. As such, the Contractor shall participate fully in all certification activities and use tools and formats that will be necessary as determined by the Agency and CMS. This certification process will have stage gate and consultation reviews at different points in the deployment process as determined by the Agency and CMS, and as shown in the Enterprise Life Cycle Overview flowchart. The Contractor shall support this entire process.

The Contractor shall deliver certifiable MMIS components. The Contractor shall expeditiously correct any item that CMS will not certify on a schedule to be approved by CMS and the Agency. The Contractor shall correct all items not certified at no additional charge to the Agency.

The Agency must apply for and receive certification of our MMIS from CMS, by demonstrating that the system meets all requirements and performance standards before receiving enhanced federal funding. The Contractor shall be the lead contractor for the certification of the MMIS subject to approval by the Agency. The Contractor shall provide all assistance requested to allow the Agency to meet all requirements of the ongoing certification transformation project.

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Recognizing CMS Certification is a critical milestone, we will lead the MMIS certification effort with approval from the Agency and assist in meeting requirements for the ongoing certification transformation project. We have

assigned a dedicated Certification Manager, Jerry Miller, to lead the team focused on CMS certification tasks. He brings to Iowa over 34 years of experience with Medicaid systems and MMIS implementations. He was State Project Lead for the Texas MMIS Compass 21/Vision 21 Design, Development and Implementation and Lead for CMS Certification of the Texas MMIS.

Certification validates that Iowa's Medicaid systems are designed to support management of the program and satisfy the applicable laws, regulations and directives. It is a multi-step process involving defined CMS





protocols and MECT. The Certification Transformation Pilot is a partnership project between the Agency and CMS to enhance current certification processes. The goal of the pilot project is to develop a MMIS certification process that will track progress throughout the MMIS system development using a blend of Enterprise Life Cycle (ELC) stage reviews and consults, MITA Self-Assessment activities, and ELC artifact generation. We understand the Agency's goal to certify the system in stages as the system is configured and tested. We recognize the effort the Agency has already put forth during the procurement and Advance Planning Document (APD) process and applaud Iowa for being on the forefront of driving improvements to the certification process. We are excited at the prospect of working with the Agency on the pilot project for certification. APHP is a new, commercial-off-the-shelf, SOA-based MMIS, designed entirely upon MITA principles. We built our solution to comply with MECT and CMS' Seven Standards and Conditions. Our product services and artifacts align to the MITA 3.0 framework business process areas. Our technology supports the informational needs of the enterprise, as defined in the MITA Informational Architecture guidelines. Our architecture supports the latest advancements in technology from an enterprise perspective, as defined in the MITA technical architecture framework. APHP provides the Agency with a framework for the future and is the ideal candidate for the pilot project.

APHP will meet CMS certification requirements for enhanced federal funding, and includes items, as documented in Attachment K, Technical Specifications Matrix. The MECT provides a set of detailed review and checklists that Accenture has analyzed and aligned with as part of the APHP design and testing process. From the beginning, we designed APHP to meet MECT requirements so that it achieves the certification required for a 75 percent match of MMIS operations under Chapter 11 of the State Medicaid Manual. Careful selection of component products and the integration of these products that APHP provides have been validated function by function with the MECT. These requirements, including Agency specific requirements, are an integral part of our ongoing requirements management and product testing.

Certification processes begin early in the ACD phase and continue until after deployment. Completion of certification activities requires extensive pre-work and a comprehensive CMS on-site visit. We collaborate with you throughout the certification process as gate reviews occur at various stages of the ACD, as shown in the Enterprise Lifecycle (ELC) flowchart that was included in the Bidders Library. CMS certification involves working as a team and is built upon open communication and transparency in all our interactions with the Agency and IME vendors.

We will deliver certifiable MMIS components for the proposed price and expeditiously correct any item in scope that CMS does not certify on a schedule to be approved by CMS and the Agency.

## 4D.1 Systems Certification

### 2.8.1 Systems Certification

*The Iowa MMIS must, throughout the contract period, meet all certification and re-certification requirements established by DHHS.*

*The Contractor shall ensure that their area of system responsibility will meet federal certification approval for the maximum allowable enhanced FFP retroactive to the day the system becomes operational and is maintained throughout the term of the Contract.*

*The Contractor shall be liable for the difference between the maximum allowable enhanced FFP and that actually received by the Agency, including any losses due to loss of certification, failure to obtain approval retroactive to the operational start date or delays in readiness to support certification.*

*All FFP assessments by DHHS will be withheld from amounts payable to the Contractor until all such damages are satisfied. Damage assessments will not be made by the Agency until DHHS has completed its certification approval process and notified the Agency of its decision in writing.*

Our strategy for meeting the Certification responsibilities is to focus, from Day 1 of the MMIS project, on requirements for CMS Certification and to support the Agency in CMS Certification activities.

The IME will receive a dedicated Certification Manager who will help keep certification as a consideration during all phases of development. Additionally, we will work to identify relevant issues going forward and to update the certification work plan tasks on an iterative basis throughout the ACD Phase. This helps eliminate any surprises and makes for a smooth Certification process.

Accenture acknowledges if our contracted MMIS services are not certified or fail to maintain certification solely because of failure on the part of Accenture, the Agency may allocate a portion of the loss of federal funds as actual damages.

We understand we may be liable for differences between the maximum allowable enhanced FFP and that actually received by the Agency, to the extent any such difference is caused by Accenture's failure to fulfill a



material obligation under the final contract between the parties, including any losses due to loss of certification, failure to obtain approval retroactive to the operational start date or delays in readiness to support certification for the Accenture-contracted services.

Further, all FFP penalty claims owed by Accenture, as described herein and in the final contract between the parties, may be withheld from amounts payable to us until all such damages are satisfied. The Agency will not make damage assessments until it has completed its certification approval process and notified us of its decision in writing. In the event that applicable federal agencies provide grace periods or other mechanisms to reduce or delay the impact of any sanctions described or reductions, we will be entitled to share in such protections.

### 4D.2 Agency Responsibilities (response not required per RFP 4.3.4.1)

### 4D.3 Contractor Responsibilities

#### 2.8.3 Contractor Responsibilities

*During this task, the Contractor shall provide technical support and assistance with federal certification as described in this section. The Contractor must perform the following tasks:*

*a. Update the CMS Certification Checklists to reflect changes or additions to system requirements that were submitted with the implementation advance planning document IAPD, including:*

- 1. All CMS Certification Readiness Checklists.*
- 2. Required information and documentation.*
- 3. Revised system documentation resulting from system remediation.*

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Our certification team, led by Certification Manager, Jerry Miller, will review and update the CMS Certification Checklists and other information to reflect changes or additions to system requirements submitted with the implementation advance planning document. The checklist includes all federal and Agency-specific system review criteria for each business objective. We collect data that demonstrates that each criterion in the checklist has been met. The federal and state-specific requirements defined in the RFP are entered into Microsoft Team Foundation Server (TFS), in which each requirement is tracked and version control tracked. Our team delivers a TFS report to meet this requirement.

Throughout the ACD and Certification Phases, our team prepares and updates agreed-upon documentation, manuals, reports and forms necessary for federal certification. Our Certification Manager works with the Agency to do the following:

- Prepare MMIS information required for submittal with the Agency’s request for Certification to CMS
- Prepare and demonstrate MMIS functionality that addresses MECT Business Area Objectives
- Respond to CMS action items and response(s) to CAP requests for CMS findings or comments
- Resolve and complete issues or action items identified at the Conference Responsibilities (CR) exit conference or identified during post-visit data analysis
- Revised system documentation resulting from system remediation

*b. Validate the RTM against the CMS Certification Checklists to affirm the readiness of the systems to be reviewed for certification.*

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We include the CMS Certification criteria, as described in the MECT, as part of our requirements definitions, load all MECT requirements in our Microsoft Team TFS requirements traceability, and address CMS-required functionality in our requirements validation and design activities and deliverables. As we work with the Agency toward Certification, we apply the internal processes, plans, and requirements traceability matrix (RTM) tracking utilities to the review and completion of the MECT checklists. These certification-specific tools, which our PMO team manages, provide a single source for progress and transparent reporting to the appropriate Agency stakeholders.

*c. Complete the Certification Readiness documentation. Collect the information and documentation needed by CMS to verify that the MMIS has been successfully operating for at least six months by the time of the visit. This information and documentation must be collected beginning on the first day of operations and cover a period of at least six months of full operation. The Contractor shall provide an electronic “folder” (a type of repository for information that demonstrates that a system criterion is satisfied) for each criterion that contains reports, print screens or other documentation that demonstrate that the criterion is satisfied. The Contractor shall provide a plan for data collection no less than 60 days prior to beginning operations. The plan must specify the documentation and information to be collected after reviewing the CMS Certification Readiness Protocol. For example, if a monthly report is produced, CMS will require monthly copies of the report. If a criterion applies to daily operations, CMS will want to see evidence from the beginning, middle, and end of the operational period prior to certification.*



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After contract start, our Certification Manager documents the plan and process for certification activities in the Application Implementation Plan (AIP) covered in Section 4B.1.b.1.2, Contractor Responsibilities for the ACD Phase. The AIP describes our methodology used throughout the ACD activities, including our approach for certification. The certification section of the AIP documents the tasks, timeline and work products for the MMIS certification process. Working with the Agency, we will identify and include in the AIP the required review gates as shown in the Enterprise Lifecycle Overview Flowchart of the Bidder's Library. The AIP identifies the steps required to support certification checkpoints, develop and update certification checklists, validate the RTM against the CMS certification checklist, prepare the CMS certification readiness documentation, prepare for the on-site review and designate the individuals who are responsible for each activity. It also covers the needed participation of Agency staff and contractors.

We update the Application Implementation Plan throughout the ACD Phase and review gates as we refine the approach and are able to provide more detail. This reduces surprises and makes for an orderly certification process. Key certification activities addressed within the Application Implementation Plan include:

- Plan for certification activities, tasks and resources in cooperation with our team and the Agency
- Process for monitoring and reporting on certification tasks
- Risk and issue mitigation relating to the certification process
- Requirements traceability approach
- Storage and promotion of certification documentation to the SharePoint electronic project repository
- Schedule for State and CMS meetings with defined roles and responsibilities
- Plans for certification activities to include: gate review and final certification preparation; gate review sessions; gate review post activities; final CMS Certification Review (CR) Team's on-site visit, CMS post-review analysis and Agency follow-up
- Approach to addressing Corrective Action Plans
- Final certification

We submit and review the AIP with the Agency as part of our standard deliverable development process to confirm the correct content and level of detail are included for certification activities. We recognize that other IME contractor teammates may be required to develop other certification planning documents as well and participate directly in the certification process.

The Certification Transformation Pilot project allows for the use of the checklists during the ACD lifecycle by tracking compliance and associated artifacts against the checklist during ACD phases of the project, including the Planning and Startup, Design, Final Design and Test, Deploy / Operational Readiness activities. As part of the updated certification process, we support the stage gate and consultation reviews at different points in the deployment process, as determined by the Agency and CMS and documented in the Iowa Medicaid Enterprise Lifecycle flowchart (contained in the Bidder's library). APHP facilitates this review process. APHP comes "out of the box" with guides, job aids, test scripts and other artifacts that describe product capabilities. We built these product artifacts based on the MITA 3.0 business processes and organized by the MITA business process hierarchy (Tier 1 Business Area, Tier 2 Business Category, and Tier 3 Business Process). They provide information on the baseline configuration, contain templates to capture specific configuration details, and provide best practices on validation of configuration parameters. Each artifact supports traceability to the MECT. We load all MECT requirements in our requirements traceability tool, Microsoft TFS, and address CMS-required functionality in our requirements validation and design activities, and deliverables.

As we work with the Agency toward Certification, we apply the internal processes, plans, and RTM tracking utilities to the review and complete MECT checklists. Our PMO team manages these certification-specific tools, which reside in SharePoint folders and provide a single source for progress and transparent reporting to the appropriate Agency stakeholders. We develop a SharePoint location specifically for the certification documentation and the corresponding e-folders by the required CMS designation. We include system technical, operational and program-related documentation and artifacts. SharePoint provides a historical version record for audit and certification purposes.

During ACD, we work collaboratively with the Agency, State Management Team, and other contractors to accomplish certification activities according to the AIP. Accenture finalizes all Certification folders on the SharePoint repository and reviews the documentation with the Agency. We review and update the certification tasks in the work plan, as needed. We document and confirm all schedules for future certification meetings between the Agency, IME contractors and Accenture. At least 60 days prior to the beginning of operations, we



provide the Agency with a plan to document the data collection needs for final certification. The plan specifies the documentation and information to be collected after reviewing the CMS Certification Readiness Protocol.

Once the MMIS is operational, we collect required MITA artifacts for CMS certification. The CMS Certification Manager and team support Certification through reporting, analyzing samples, providing walkthroughs and demonstrations, and submitting completed system documentation to the Agency for review and approval. We collect documentation and reports beginning on the first day of Operations. This information demonstrates to CMS that the MMIS functions, as described in the Advanced Planning Document (APD). This information collected covers a period of at least six months of full operation, and includes all samples, reports and other artifacts as identified and approved by the Agency in the Certification data collection plan.

*d. Assist the Agency in responding to CMS requests prior to the on-site certification visit and during the site visit.*

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We assist the Agency in responding to CMS requests, as described below.

**Entrance Conference:** At the request of the Agency, the Certification Manager and other requested staff member attends the Site Visit Entrance Conference. The intent of attendance at this conference is to coordinate schedule, logistics, and state and contractor staff availability. We provide services (Figure 4D-1) to the Agency in response to CMS requests for the Entrance Conference.

**Entrance Conference Responsibilities**

- Certification Manager attendance at the request of the Agency
- Knowledgeable staff to provide additional new MMIS information and answer questions, if needed
- Provide any additional information about system changes since the Pre-Certification meeting/call
- Facility tour

IA MMIS-2 13 025

*Figure 4D-1. Accenture is ready to support the Agency during the CMS Entrance Conference.*

**Evaluation of the MMIS:** With approval by the Agency, our Certification Manager, supported by technical or operations staff, provides MMIS presentations for the CMS CR Team members to introduce them to the APHP solution and review the certification deliverables, how they were collected and where they can be found on the SharePoint site. We also clarify responses to CMS CR Team questions raised during the presentation. Figure 4D-2 highlights our support in response to CMS requests for additional information.

**Evaluation of the MMIS Responsibilities**

- Certification Manager attendance at the request of the Agency
- Knowledgeable staff to provide additional MMIS information and answer questions, if needed
- Support Daily Summary meeting requests concerning the new MMIS
- Address and resolve problems prior to exit conference

IA MMIS-2 13 024

*Figure 4D-2. We support any CMS requests for additional information.*

**Exit Conference:** At the request of the Agency, our Certification Manager attends the Site Visit Exit Conference and assists the Agency in addressing any feedback received from the CMS CR Team Lead concerning any checklist items and additional information and/or documentation required.

The Exit Conference should provide an indication for the Certification outcome. Figure 4D-3 provides potential services provided to complete MMIS certification. Our Certification Manager reviews and prepares a response for the Agency for any Corrective Action Plans (CAPs) needed to address CMS issues or concerns and provide a tentative schedule for their completion.

**Exit Conference Responsibilities**

- Certification Manager attendance at the request of the Agency
- Knowledgeable staff to provide additional new MMIS information and answer questions, if needed
- Address and resolve action items, requests for additional information and/or documentation requirements
- Review and prepare a response to any Corrective Action Plans (CAP) for Agency submission

IA MMIS-2 13 023

*Figure 4D-3. Our certification staff prepares responses to action items or CAPs, if required.*



*e. Provide necessary resources to the Agency for certification.*

**CR-5**      **Att L - 29**      We provide a Certification Manager and a dedicated Certification Team, consisting of a Certification Project Manager and systems and operations resources to support the Agency during each step of the preparation.

*f. Assign an individual to coordinate all IME activities for the certification process.*

**CR-6**      **Att L - 29**      Certification Manager, Jerry Miller coordinates all IME activities for the certification process.

## 4D.4 Change Control for Certification

### *2.8.4 Change Control for Certification*

*The Contractor shall execute appropriate controls for changes made during the certification process including testing requirements. Change must be managed in accordance with the requirements of the change control requirements herein.*

During the Certification Phase, we continue to use the existing change control process installed during the Start-up Phase. Our Certification Manager has responsibility for change control compliance during the Certification Phase. Our goal is to have a certifiable system on the first day of operations. We expeditiously correct identified deficiencies. As discussed previously, our proactive process leads to certification to close gaps prior to the official start of the certification process to avoid items deemed as uncertified by CMS. This includes:

- Assign certification responsibilities to team members during project start-up and training that team in all certification processes and protocols
- Establish the certification checklist criteria on day one of the project and update, as appropriate, during requirements verification and design activities
- Establish the certification database on the electronic repository
- Gather and monitor documentation on a regular, iterative process throughout the Implementation and Certification phases
- Test certification business functionality as specified on the checklists during system and User Acceptance Test periods
- Work with the Agency and stakeholders in executing mock certifications to help prepare CMS' on-site visit

If the CMS CR Team identifies system deficiencies, we perform the necessary activities to correct the identified issues.