

# Connect for Health Colorado

## IV&V Bi-Monthly Report

### Review #4/5

For Period of July / August 2013

Version 1.0

Submitted August 12, 2013

Internal Work Product

**Revision History**

Version No.	Date	Summary of Changes	Modified By
1.0	8/12/13	Initial draft	Yen L. Pham
1.1	8/20/13	Incorporated C4HC comments; Final.	Yen L. Pham

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## 1.0 Introduction

This section provides an overview of the Connect For Health Colorado (C4HC) and the scope of Independent Verification and Validation (IV&V) Services as it relates to the C4HC.

### 1.1 Background

The Patient Protection and Affordable Care Act (PPACA) was signed into law on March 23, 2010. Following, in May 2011, the Colorado General Assembly passed Senate Bill 11-200, which established the Connect for Health Colorado (C4HC), a public entity governed by a Board of Directors. Connect for Health Colorado (C4HC) selected CGI as the Systems Integrator (SI). CGI commenced work on June 06, 2012. The Connect for Health Colorado (C4HC) intends to increase access, affordability and choice for individuals and small employers purchasing health insurance in Colorado. The implementation of the Exchange System will be in accordance with federal guidance from Centers for Medicare and Medicaid Systems, HIPAA and IRS 1075 regulations. The Exchange will also provide technical interoperability with, multiple federal, state and carrier systems required to operate individual and SHOP Exchanges. The design of the Exchange System will leverage several commercial-off-of-the-shelf (COTS) products plus modifications made by the System Integrator (SI), CGI. Additionally, the Service Center Solution will utilize Oracle RightNOW Cloud Service. The following COTS products are as follows:

- hCentive: The product will enable eligibility determination, plan selection and enrollment capabilities.
- Healthation: The product will enable billing/accounts receivables.
- Oracle CRM: The product will provide the Customer Relationship Management functionality.

### 1.2 Purpose and Scope

Connect for Health Colorado (C4HC) selected First Data to provide Independent Verification and Validation ("IV&V"). The IV&V consist of services to provide an independent assessment of deliverables and performance of the Systems Integrator (SI), and evaluate the 'Exchange' and its related Stakeholders. The main goal of IV&V is to assist the C4HC Project by identifying technical, financial or scheduling deficiencies with the development of the 'Exchange' as early as possible in the life cycle to have time for corrective actions.

The IV&V Team will perform five bi-monthly interim Exchange reviews. The services will be provided in the timeframes as specified below:

Reviews #	Duration of Reviews	Approximate Timeframe	Status
1	7 weeks	November – January '13	Completed
2	4 weeks	March '13	Completed
3	4 weeks	May '13	Completed
4/5	5 weeks	July-August '13	Completed

### 1.3 Approach and Methodology

In order to conduct the review of the Connect for Health Colorado (C4HC) Project, the IV&V Team used the four-phased framework:

Phase 0 - Planning (Prior to day 1 of on-site activities)

- Conduct an initial meeting with C4HC to discuss the current progress of the findings in the previous Review, and the recommended areas of focus for the upcoming Review.
- Develop a Review Schedule for the upcoming Review (e.g. on-site interviews, meetings, artifacts needed, follow-up Q&A and wrap-up meeting/debrief, etc.).
- Conduct meeting with C4HC and CGI to discuss the Review Schedule.

Phase 1 - Artifacts and Meeting Set-Up (Prior to day 1 of on-site activities)

- Gather required materials from C4HC and respective vendors (either on SharePoint or sent by C4HC and respective vendors).
- Interviews and or/meetings scheduled by C4HC and CGI.

Phase 2 - Conduct assessment

- Review artifacts and perform preliminary assessment. Request supporting materials as needed.
- Participate in meetings and/or conduct interviews to understand the current progress and clarification on artifacts received.

Phase 3 - Prepare the draft report

- Document current progress and findings.
- Solicit clarification if needed.

Phase 4 - Submit final report

- Submit draft report to C4HC for review.
- Obtain C4HC's comments.

- Incorporate C4HC’s comments and submit final report.
- Conduct meeting to present major findings/recommendations to C4HC leadership.

### 1.4 Roles and Responsibilities

The following table documents the roles and responsibilities associated with the development, review and approval of the deliverable.

Role	Person	Responsibility
First Data Deliverable Owner	Yen L. Pham	Responsible for the Bi-Monthly Review deliverable.
Connect for Health Colorado IV&V Lead	Gary Schneider	Responsible for feedback, and approval of the deliverable.

### 2.0 Executive Summary

The Exchange is a multi-faceted project that will require a number of iterations to evaluate the full project. The previous review focused on a subset of documents for the Federal Design Deliverables Review as directed by Connect for Health Colorado (C4HC). This current review focused on operational readiness in several different areas of the Exchange.

This section provides an overview of the review conducted by the IV&V Team. This assessment covers the period from July 15, 2012 through August 16, 2013. The report represents a point in time. The IV&V Team typically has a cutoff point of one week prior to when the report draft is due. However, if significant new information is available, it is incorporated into the final report. The areas of focus were based on agreed priority with C4HC to meet the assessment.

C4HC and HCPF Interoperability  
 Service Center  
 Service Portal  
 Deployment Planning  
 Business Continuity

Configuration Management  
 Requirements Traceability  
 System Test  
 User Acceptance Test

### 3.0 Overall Project Status

The Exchange consists of many components, including Eligibility, Enrollment, Plan Management, Financial Management and an integrated Service Center. There are multiple Federal, State and Carrier Partner agencies with whom the Exchange must coordinate and

several critical interfaces that must be developed in coordination with the Department of Insurance (DOI), Colorado Office of Information Technology (OIT), Colorado Health Care Policy and Financing (HCPF), the Federal Data HUB, carriers and others.

Finalizing policy decisions and scope is challenging since it most often requires agreement across agencies. The Exchange is required to be open in the fall of 2013 for coverage starting January 1, 2014. From a business, functional and technical perspective, the combination of the numerous components, coordination with multiple partners and aggressive timelines contribute to the complexity of the Exchange Project.

Overall, the Project has been actively engaged in development, System Test, User Acceptance Test and Implementation Readiness. The Deployment Plans are developed and the activities are in progress. Connect for Health Colorado and the vendors have a collaborative working relationship, which has led to successfully meeting key milestones to date. Vendors have met all of the release dates. Connect for Health Colorado continues to have a strong relationships with the Carriers, both from a business and a technical perspective. Timing is a huge element of the Exchange Project and it requires tight coordination and collaboration. Connect for Health Colorado and CGI continue to seek ways to reduce risks to deliver the Exchange on time. Connect for Health Colorado leadership continues to be involved in all aspects of the development of the Exchange; this has allowed Connect for Health Colorado to implement corrective actions to avoid potential issues. Connect for Health Colorado leadership continues to take a very pragmatic view of the steps needed to implement the Exchange; they are willing to compromise by making difficult decisions to ensure the Project stays on schedule.

There were no critical issues identified in the previous Review. There are several new findings documented in this IV&V Report that can affect the overall delivery schedule. There is time to remedy these situations with corrective actions and these issues should be addressed immediately. The critical concerns and a recommended action plan for each are:

Health Care Policy and Financing (HCPF) Interoperability: Connect for Health Colorado (C4HCO) and the Colorado Department of Health Care Policy and Financing (HCPF) have identified an issue with data transfer and have agreed to a resolution approach. C4HCO and HCPF believe that this solution will address the most important consumer priorities, which are:

- Identify a solution that maximizes accurate determinations for Medicaid and tax credits,
- Identify a solution to maximize the probability that C4HCO will go live on October 1, and
- Identify a solution that provides good customer service and timely responses for all applicants.

The new approach, introduced this close to the go-live date, adds significant development and operational risk due to impacts on testing and other the work streams such as Service Portal, Service Center, Back Office and Training which may require re-work or additional work effort. There is limited time remaining to design, build, and test.

- Recommendation:
  - C4HCO and HCPF should evaluate the work effort and determine if additional resources are needed to complete the work in a timely manner.
  - C4HCO should evaluate the impacts to the other work streams and identify and prioritize the necessary work efforts to minimize the amount of required system and/or operational changes.
    - The effort is in progress.
  - C4HCO and HCPF should aggressively monitor the agreed-upon development plan.
    - The effort is in progress.
  - C4HCO and HCPF should have a contingency plan in the event that the aggressive plan cannot be executed in the time available.

Service Center: The Service Center build out of the facility and technology implementation is currently on schedule. The Project continues with the build out of the facilities and infrastructure, recruitment of staff and development of operation procedures. A tremendous amount of construction has been completed within the short timeframe. There is a short timeframe between the order placement and delivery of network and desktop equipment; these are highly dependent on other work streams. Any delays or inaccuracies could impact the overall delivery schedule. The Oracle RightNOW CX (OCX) development and Exchange integration is in progress but is challenged with the extremely short timeframes. If the OCX and Exchange integration is not completed within the timeframe, the Service Center can still handle incoming calls from customers; as the integration is independent from the call routing capability. With respect to operations, staff recruitment and development of procedures are currently on schedule. Training for 40 Service Representative has started. Due to multiple vendors involved and compressed timelines, it is imperative the dependencies and key milestones align across the multiple Project Schedules.

- Recommendation:
  - Continue to monitor the key dependencies and key milestones.
    - The effort is in progress. The Project Schedules are closely monitored and there is daily communication amongst the team.



Testing and Environments: System Test and IV&V Test are in progress. The User Acceptance and Production environment has been impacted due to environment challenges. Given the compressed timelines, this could impact quantity and quality of testing.

- Recommendation:
  - In the interim, utilize System Test environment to start User Acceptance Test.
  - Add resources to the UAT effort due to the compressed timeframe.
  - Add resources to resolve the Production environment issues.

This report represents a point in time evaluation of the project management practices currently in place and focuses on the plans to resolve. The concerns identified in this report are correctable. With focus from C4HC, CGI and Eventus, First Data's assessment can be largely corrected and the risks mitigated.

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