February 13, 2023

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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Baltimore, Maryland 21244-1850

SYSTEM READINESS ARTIFACTS

The Families First Coronavirus Response Act's (FFCRA) Medicaid continuous coverage requirement has allowed people to retain Medicaid coverage and obtain needed care during the pandemic. Congress passed the Consolidated Appropriations Act (CAA) on December 23, 2023, an omnibus funding package that separates the continuous coverage provision from the COVID-19 public health emergency by providing a fixed end date of March 31, 2023. The CAA also includes a gradual phase down of the enhanced federal match rate and new guardrails to prioritize coverage retention and smooth coverage transitions during the unwinding period.

To ensure system readiness for the unwinding of the continuous coverage protection, CMS is requiring states to provide three system readiness artifacts for CMS' review. These include a configuration or implementation plan, a test plan, and test results. System readiness includes the planning for system changes and for programming those changes into the system. Testing readiness is vital. If testing is skipped or incomplete, undetected system problems are likely to occur that can impact beneficiaries' eligibility and enrollment and result in more work for states to fix the problem.

At the start of the pandemic, Nevada's Department of Health and Human Services (DHHS), through the Division of Welfare and Supportive Services (DWSS), began researching ways to implement and manage the required changes on its eligibility engine. Nevada is among a few states that have a combined eligibility engine for all public assistance programs, including eligibility for Medicaid, the Supplemental Nutrition Assistance Program, (SNAP), and the Temporary Assistance for Needy Families (TANF) Program. Because of the intertwined nature of the system and the eligibility evaluation process, DWSS needed to maintain continuity amongst all programs to ensure accurate case processing. The result meant DWSS would choose a course of action that had the least impact on the combined eligibility engine and its many system functions.

NEVADA'S LESS IS MORE PLAN

To manage the required FFCRA changes, DWSS would implement a manual workaround process for both the system and the cases that would continue to be processed by staff. For the system itself, DWSS continued its normal monthly cycle of initiating and mailing out prepopulated renewal forms to all Medicaid households due for a renewal that month. DWSS IT staff would then interject a manual stoppage within the monthly cycle allowing them to run queries that identified and extended the eligibility of Medicaid households who did not respond to the prepopulated renewal form. This step allowed these cases to continue without any staff action required. Because DWSS uses a combined system, the renewal packets were required for other programs such as SNAP and TANF. With the duration of the pandemic unknown at the time, Medicaid eligibility was extended in 6-month blocks.

The second piece of the strategy involved re-training DWSS staff on processing Medicaid and combination cases (Medicaid cases with a SNAP and/or TANF component) during the pandemic. If the results of the evaluation meant a reduction or termination of Medicaid eligibility, then DWSS staff would take steps to manually issue an override of the engine's results, allowing Medicaid benefits to continue at the appropriate level. Any action required for SNAP and TANF were still taken as needed. Like the system workaround above, Medicaid eligibility was issued in 6-month blocks.

Because of the unique nature of DWSS's combined eligibility engine, the need to keep the system functioning as normal as possible, and only taking steps to ensure continuous Medicaid eligibility, as needed, meant that DWSS IT and eligibility staff had to keep processing all public assistance programs as close to normal as possible. Since there was no system or case processing changes, Nevada did not create an enormous backlog of renewals dating back to March 2020 to complete once the pandemic was declared over.

The following information on Nevada's Eligibility System Readiness is provided as requested by CMS as preparations for Nevada's PHE unwinding plans.

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KC/ts/rs

Unwinding System Readiness:

Configuration or Implementation Plan

Due to the fact DWSS made no system changes during the pandemic, there were no system changes to reverse engineer.

The State of Nevada has been granted waivers during the unwinding period to assist in updating contact information for Medicaid households. These waivers include the use of the US Postal Service's National Change of Address (NCOA) database, the partnership with contracted Managed Care Organizations (MCO), and the additional outreach through various media outlets and websites in an effort to educate Nevadans on the need to update their contact information to avoid unnecessary loss of medical coverage through administrative action.

Test Plan

Since there are no system changes to reverse engineer, there is no test plan.

Test Results

No testing results to provide as there were no system changes to reverse engineer.

Federal Poverty Level (FPL) Guidelines:

Configuration or Implementation Plan

Annually DWSS updates the poverty levels used by its eligibility engine in accordance with the new Federal Poverty Level (FPL) guidelines issued by the Assistant Secretary for Planning and Evaluation (ASPE) every January with an effective date of April 1st. The DWSS system is a 60-day system, meaning eligibility can be determined for the current month and the following two months. It is noted in the Nevada State Plan that the FPLs are updated annually beginning in April. To make these changes, the ASPE percentage tool spreadsheet is downloaded from the ASPE website, and the information is entered into the eligibility engine directly.

Test Plan

Once entered into the engine data tables, a DWSS eligibility program specialist reviews the entered data for accuracy and completeness. Any corrections or changes are made immediately. Once verified, DWSS IT staff then bounce the data tables into the production environment with no downtime in eligibility case processing by DWSS staff.

Test Results

The results of the specialist's review are noted and tracked in the FPL update documents for future reference when updating the FPL for the next year.

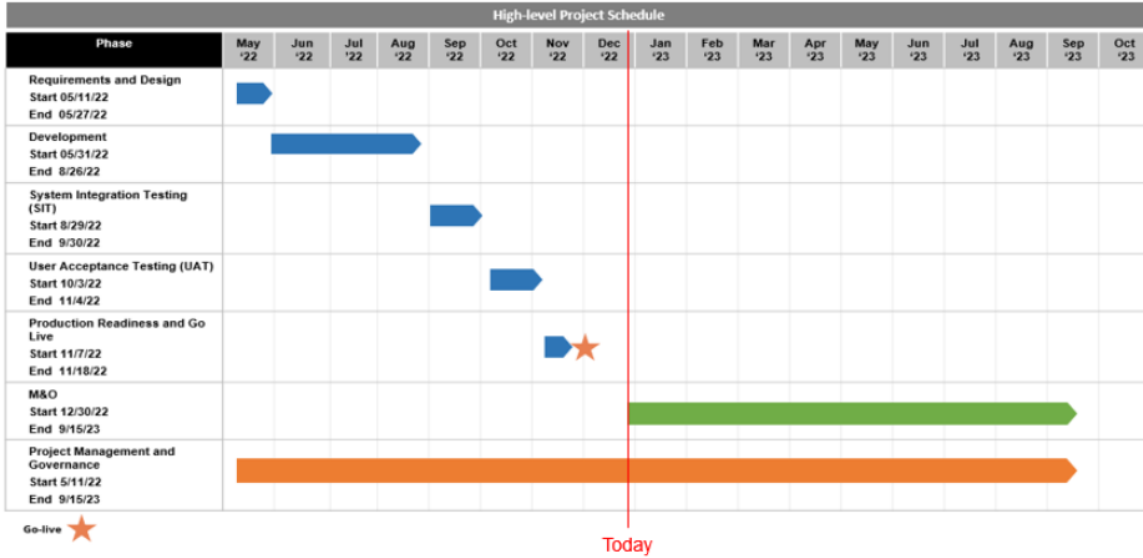**Ex Parte Enhancements and Implementation Plan:**

DWSS began working on extending its use of ex parte renewals as soon as possible before the end of the pandemic was announced. Contracting with Deloitte Consulting, DWSS quickly worked through the requirements and interface updates needed to identify and approve Medicaid eligibility for households using available data sources and MAGI budgeting methodologies. The summaries listed below provide an overview of the project from start, August 2022, to final implementation in December 2022. As a result of the detailed knowledge Deloitte Consulting has of DWSS' eligibility system, coupled with their understanding of ex parte processes and requirements, DWSS was not only able to implement ex parte in 4 months, but was also able to include Non-MAGI renewals to its ex parte program, which is something no other state has yet accomplished.

EP-10134 Develop Automated Ex-Parte Renewal Processing
Deloitte Updates

Project Timeline

High-level Project Schedule

Phase	May '22	Jun '22	Jul '22	Aug '22	Sep '22	Oct '22	Nov '22	Dec '22	Jan '23	Feb '23	Mar '23	Apr '23	May '23	Jun '23	Jul '23	Aug '23	Sep '23	Oct '23
Requirements and Design Start 05/11/22 End 05/27/22																		
Development Start 05/31/22 End 8/26/22																		
System Integration Testing (SIT) Start 8/29/22 End 9/30/22																		
User Acceptance Testing (UAT) Start 10/3/22 End 11/4/22																		
Production Readiness and Go Live Start 11/7/22 End 11/18/22																		
M&O Start 12/30/22 End 9/15/23																		
Project Management and Governance Start 5/11/22 End 9/15/23																		

Go-live ★

Today

Key Accomplishments and Next Steps

	Key Accomplishments	Next Steps
PMO	• Prepared December Steering Committee decks, and weekly planning meetings • Submitted M&O Report Month 1 on 12/15/2022	• Prepare Steering Committee Meeting updates for January • Prepare M&O Report Month 2, due 01/13/2023
Design Development and SIT Testing	• Phase Completed	• N/A
UAT	• Phase Completed	• N/A
Production Readiness	• Phase Completed	• N/A
Roll-Out	• Promote completed on 11/18	• N/A

Production Support	**Batches**
	• Intake batch completed on 12/1 and analyze records
	• Request batch on 12/2 and analyze records
	• Monitored the TIBCO site until we received responses from CMS; response batch run on 12/8, and completed on 12/12
	• Ran renewal batch on 12/14 and analyzed records
	• Ran regular RD batch to pick up ineligible Ex-Parte cases on 12/17
	
	Emergency Promote
	• Bug 24855 promoted on 12/14
	• Bug 24863 promoted on 12/20
	
	Other
	• Support smoke-test post-production
		• Fix any reported bugs
		• Run CF batch on 12/31/2022
		• Run Ex-Parte Batch on 01/02/2023
		• Planned Emergency Promote before 12/30/2022:
		  • 24858 RRV Request Batch- Exception Status Update
		  • 24860 Auto Renewal Batch
		  • 24857 Intake Batch Enhancements
		  • 24859 RRV Response Batch

Project Deliverables / Milestones

Submitted Deliverables/Completed Milestones

Deliverable Title	Due Date	Submitted On	Sign-Off Due	Sign-Off Date	Comments
M&O Report Month 1 (Dec '22)	12/15/22	12/15/22	12/22/22	12/22/22	

Upcoming Deliverables/ Milestones

Deliverable Title	Due Date	Sign-Off Due	Comments
M&O Report Month 2 (Jan'23)	01/13/23	01/23/22	

EP-10134 Develop Automated Ex-Parte Renewal Processing

DWSS Updates

Risks

ID#	Risk Description	Owner	Status	Date Identified	Date Resolved	Mitigation Strategy/Updates

Issues

ID#	Risk Description	Owner	Status	Date Identified	Date Resolved	Mitigation Strategy/Updates
1	Environment issues intermittently have caused delays through the UAT phase	DWSS	Closed	10/03/2022	11/09/2022	35% completed, and suspect to finish all test cases on time
2	BPM Issue	DWSS	Closed	11/15/2022	11/17/2022	Production BPM update issue reported by Ops team. If issue not resolved before scheduled release, rules engine items will not be promoted during November normal promote cycle.

DWSS PMO Updates

Project Activities	Key Accomplishments	Next Steps
PMO	• Sent survey in preparation for close out meeting	• Prepare and schedule project close out meeting
Plan	• ENoD smoke testing discussion with Ops, DWSS Dev and EITS – 12/28/2022 • ENoD smoke testing date set for 01/01/2022 at 10am • 11/09 SmartComm template and components released to production -12/28/2022 • 11/28 SmartComm ENoD components backed out and deleted then redeployed to production – 12/28/2022 • Defect 24721 – Incorrect Status and Reasons for case with UNIN (52) Job Corp Income (Rules fix needed to make in the income budgeted as it is taxable and countable) added to January M&O - release date 01/13/2022	• Resolve defect 24865 (enhancement) – Add auto CLOG for time period between action date and carry forward • RD start state issues and CLOG fix release to production – 12/30 – 01/03 • Meeting with EITS and Jennifer Thomas (mailroom) to discuss ENoD prints – 12/30 at 10am • DWSS to work with Deloitte during M&O to resolve defects and increase ex-parte performance.