

# CalSAWS Risk Management Group (RMG) Report

June 18, 2025 (Off Cycle)

#### LIST OF OPEN RISKS

- **Risk 102** Lack of annual project funding may cause schedule delay or reduction in scope for CalSAWS & other projects
- **Risk 203** The CalSAWS web portal has limited features and accessibility which may impact the project's ability to disseminate information clearly and the counties' ability to locate information easily and timely.
- **Risk 312** Delays in completing requirements and design for Single Streamline Application (SSApp) may impact CalSAWS delivery and support
- **Risk 314** Limited Availability of Accenture Staff May Impact the M&E Transition Schedule
- **Risk 315** Absence of a Finalized 2026 CalHEERS release schedule may create challenges for CalSAWS to deliver CalHEERS-designated changes
- **Risk 316** Failure to effectively transition the identity management solution (Ping Identity) could result in system access problems for users
- **Risk 317** Updated May Revise Budget Medi-Cal Revisions effective January 1, 2026, may be at risk for Delivery

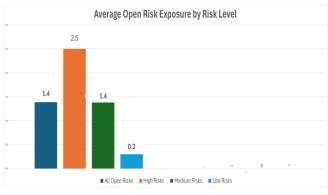
## CalSAWS RMG Risk Report – June 18, 2025 (Off Cycle)

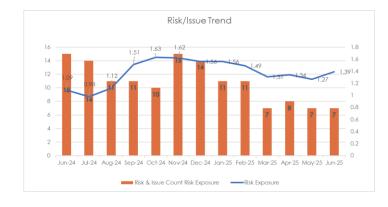
#### **GENERAL ANALYSIS**

There are currently seven open risks documented in the SharePoint Risk Log. Five risks are at a medium risk level. The overall Project risk level of 1.39. Four risks have trigger dates occurring within the next 90 days.

There are currently no open issues within the SharePoint Issue log.







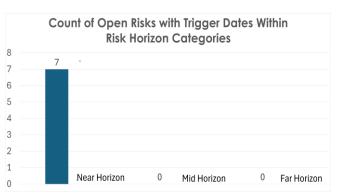


Figure 1 Overall Risk Level and Numerical Analysis

#### CALSAWS MAINTENANCE AND OPERATIONS

### 102 - LACK OF ANNUAL PROJECT FUNDING MAY CAUSE SCHEDULE DELAY OR REDUCTION IN SCOPE FOR CALSAWS & OTHER PROJECTS

| DESCRIPTION  | OWNERS       |
|--|--------------|
| The project is subject to state funding approval each year. State general fund payments may be deferred, or budget cuts may cause schedule delays, scope reductions, or staff reductions | Holly Murphy |

| LEVEL | Trending       | EARLY IMPACT DATE | TRIGGER DATE |
|-------|----------------|-------------------|--------------|
| High  | Remains same 🖚 | 10/10/2025        | 1/10/2026    |

#### **LATEST STATUS NOTES**

- May 29, 2025: CPMO confirmed the May Revise as released on May 14th was as expected. CMS approved the January 2025 IAPDU on May 22, 2025. FNS approval is pending. CPMO continues to monitor State and federal budget plans to identify potential impacts.
- May 5, 2025: CPMO is working to respond to CMS comments and questions including the annual certification process to continue enhanced funding.
- April 4, 2025: CPMO conducted a walkthrough with federal sponsors on March 26th to provide an overview and clarification of funding updates. CMS reported a high backlog, which may lead to delayed approval. The team also continues to provide additional information on the ABQ as requested by State partners.

#### **CURRENT MITIGATION PLAN**

Consortium PMO will monitor actual and projected costs against plan to assess utilization and monitor new funding needs for future funding requests as part of standard processes and apply updates per State schedule:

- Verify monthly updates to the State's Master Automation Effort Tracker to identify gaps— Ongoing Monthly
- Prepare and submit Automated Budget Questionnaire (ABQ) August/February
- Coordinate with State partners to address comments and questions Fall and Spring budget cycles
- Verify proposed budget January/May
- Address funding gaps February/June

203 - THE CALSAWS WEB PORTAL HAS LIMITED FEATURES AND ACCESSIBILITY WHICH MAY IMPACT THE PROJECT'S ABILITY TO DISSEMINATE INFORMATION CLEARLY AND THE COUNTIES' ABILITY TO LOCATE INFORMATION EASILY AND TIMELY.

| DESCRIPTION   | OWNERS                        |
|---|-------------------------------|
| March 6, 2025 The CalSAWS web portal has limited features and accessibility which may impact the project's ability to disseminate information clearly and the counties' ability to locate information easily and timely.;December 1, 2024: The Project must continuously evolve, and the effectiveness of communications must be evaluated on an ongoing basis otherwise the County stakeholder needs for timely, tailored, and accurate information may not be met and could impact the quality of the stakeholder experience or require additional resources. | Holly Murphy,<br>Peggy Macias |

| LEVEL | Trending | EARLY IMPACT DATE | TRIGGER DATE |
|-------|----------|-------------------|--------------|
| Low   | Downward | 7/1/2025          | 10/1/2025    |

#### **LATEST STATUS NOTES**

- May 29, 2025: Designated Consortium staff will attend a product demonstration on June 17, 2025 to assess alignment with requirements.
- May 5, 2025: CPMO continues to identify requirements and is planning for upcoming product assessments.
- April 4, 2025: CPMO is working on a refresh and consolidation of information previously gathered to establish a basis for requirements for a new web portal.

#### **CURRENT MITIGATION PLAN**

March 6, 2025, Mitigation Plan:

- Update the web portal to improve access to information, improve user experience, and streamline organization of information:
  - Develop requirements for a new web portal (CPMO/Customer Engagement, target May 1, 2025)
  - Complete alternatives analysis of software options and assess costs (Gainwell Tools Team/CPMO/Customer Engagement, target June 1, 2025)
  - Design and develop new web portal (Gainwell Tools Team/CPMO/Customer Engagement, target July 1, 2025)
  - Develop standards and maintenance processes to support integrity of the web portal (CPMO/Customer Engagement, target quarter 3 2025)

- Facilitate organizational change management and training (CPMO/Customer Engagement, target quarter 3 2025)
- Implement new web portal, (Gainwell Tools Team/CPMO/Customer Engagement target quarter 4 of 2025)

#### **M&O PRODUCTION RISK**

## 312 - DELAYS IN COMPLETING REQUIREMENTS AND DESIGN FOR SINGLE STREAMLINE APPLICATION (SSAPP) MAY IMPACT CALSAWS DELIVERY AND SUPPORT

#### **DESCRIPTION**

The Online Single Streamline Application(SSApp), through the California Healthcare Eligibility, Enrollment and Retention System (CalHEERS) portal, is planned to be delivered in September 2025 to meet Centers for Medicare & Medicaid Services(CMS) and State regulations.

The delivery of these changes includes updates to CalSAWS, BenefitsCal, CalHEERS, and MEDS. Completion of CalHEERS requirements and design is delayed two weeks due to the late addition of this effort to the 25.9 CalHEERS Release. Due to the late addition, this change requires expedited design, review, and approval.

Breadth of requirement impact on various systems include CalSAWS, BenefitsCal, CoveredCA, and MEDS.

#### Milestone Schedule:

- CalSAWS/CalHEERS Requirements (Completed) Baseline: February 25, 2025; Updated: March 13, 2025
- BenefitsCal Requirements Complete (Completed) April 25, 2025
- CalHEERS Design Complete (Completed) Baseline: March 14, 2025:
   Technical Docs Approved March 13, Functional Doc Pending Approval
   Due March 12
- CalSAWS Design Complete (Completed) May 1, 2025
- BenefitsCal Design Complete June 27, 2025
- CalSAWS/CalHEERS Integration Build Complete: June 27, 2025
- BenefitsCal/CalSAWS Integration Build Complete: July 27, 2025
- CalSAWS/CalHEERS Integration Test: June 30, 2025 August 15, 2025
- CalSAWS/BenefitsCal R25.09 Build Complete July 25, 2025
- CalSAWS/BenefitsCal R25.09 System Test July 28, 2025 September 17, 2025
- CalSAWS/BenefitsCal R25.09 Release Date: September 22, 2025
- CalHEERS Release Date: September 22, 2025

#### **OWNERS**

Sharon Teramura, Fredrick Gains, Michele Peterson, Renee Gustafson, Onur Senman, Emmeil Davis

| LEVEL  | Trending       | EARLY IMPACT DATE | TRIGGER DATE |
|--------|----------------|-------------------|--------------|
| MEDIUM | Remains same 🛑 | 6/27/2025         | 7/25/2025    |

#### **LATEST STATUS NOTES**

- 6/1/2025 DHCS requirements changes completed. Early Trigger Date changed 6/27/25 and Trigger Date changed to 7/25/25 since SSApp is on track for 25.09 completion.
- 5/1/2025 DHCS has identified requirements changes that will reduce the effort. Impact analysis is in progress.
- 3/17/2025 Risk created

#### **CURRENT MITIGATION PLAN**

CalSAWS/BenefitsCal to continue Requirement and Design Impact Analysis - Completed 6/1/2025 - Confirm Requirements and Design Impact Analysis with CalHEERS and DHCS - Completed 3/13/2025 - Monitor internal and external schedule and delivery milestones adjusting scope and schedule, as needed (In Progress)

## 314 - LIMITED AVAILABILITY OF ACCENTURE STAFF MAY IMPACT THE M&E TRANSITION SCHEDULE

| DESCRIPTION  | OWNERS  |
|--|---|
| Limited availability of Accenture Knowledge Transfer (KT) providers to support the timely transition of M&E Services to Deloitte while also supporting ongoing M&E Releases, Premise and other critical projects (e.g., CARES, WDTIP, etc.). The impact would be during KT (3/3-5/30) and Reverse Shadow (5/5-10/3/2025). Deloitte's Reverse Shadow transition activities include overlap on top of the Accenture team Design/Build/Test for Release 25.09 (April-Spt). Examples of additional transition activities where Accenture may have limited staffing capacity (e.g., provide review of updated documentations, troubleshooting outcome differences from Deloitte's RS, provide data integrity for batch jobs/maintenance/ad-hoc queries, data fixes, L3 ticket triage/resolution, etc.). | Lulu Fou, Lisa<br>Salas, Rajesh<br>Tahaliyani, Mike<br>Henry, Holly<br>Murphy, Yong<br>Vangbliayang,<br>Pandu Gupta |

| LEVEL  | Trending       | EARLY IMPACT DATE | TRIGGER DATE |
|--------|----------------|-------------------|--------------|
| MEDIUM | Remains same 💳 | 3/3/2025          | 6/30/2025    |

#### **LATEST STATUS NOTES**

- 5/23/2025: The Accenture team is able to support the M&E Transition while continuing to keep up with the M&E enhancement planned for Release 25.09 and work down the production defect backlog to all time low. The team will continue to monitor transition support as we move into the Back Shadow for 25.11 at the end of May/beginning of June,
- 4/30/2025: Accenture continues to provide KT/JS as planned. Commenced providing JS for Release 25.09.
- 4/15/2025: Accenture and Deloitte have finalized the list of SCRs and the approach to JS and RJS for and KT Release 25.09.

#### **CURRENT MITIGATION PLAN**

February 21, 2025: The Project has a plan to conduct KT based on the Release schedules (e.g., CalSAWS Baseline, CalHEERS, COLA, SIRFRA/SCERFRA) to meet the M&E Transition cutover timeline by 1/30/2026. Deloitte will be providing the Knowledge Transfer (KT) Plan for Accenture to review and schedule participants availability. This collaborative KT scheduling approach will allow Accenture staff to balance both M&E commitments and support the M&E Transition.

- For KT: Record KT sessions, collapse duplicate KT sessions, do cascade KT.
- For RS: Stagger RS one month after JS for each function/services.

## 315 - ABSENCE OF A FINALIZED 2026 CALHEERS RELEASE SCHEDULE MAY CREATE CHALLENGES FOR CALSAWS TO DELIVER CALHEERS-DESIGNATED CHANGES

#### DESCRIPTION

Every year, California Healthcare Eligibility, Enrollment and Retention System (CalHEERS) and CalSAWS Project performs an annual review of the prioritized changes for the upcoming year. This process facilitates planning and coordination of upcoming changes to accommodate Joint Application Design, Build, and Test activities within a 12-month timeframe. Three (3) integrated CalSAWS/CalHEERS releases are planned for 2026: 26.2, 26.6, and 26.9. Requested 2026 CalHEERS changes, with CalSAWS impacts, was larger than historical years. In addition, DHCS requested an additional release to support Verify Lawful Presence Service changes. DHCS, CalHEERS, CalSAWS are conducting sessions to plan out the entirety of 2026 taking in consideration CalSAWS M&E Transition, CMS Requirements, and on-going DHCS policy prioritization. CalSAWS' ability to deliver 2026 CalHEERS designated changes may be at risk without a finalized CalHEERS release schedule.

Sharon Teramura, Michele Peterson, Jerry Nielson, Pragati Sharma, Emmeil Davis

| LEVEL  | Trending       | EARLY IMPACT DATE | TRIGGER DATE |
|--------|----------------|-------------------|--------------|
| MEDIUM | Remains same 🛑 | 6/23/2025         | 7/23/2025    |

#### **LATEST STATUS NOTES**

- 6/1/2025 DHCS has added CalHEERS CR 306642 (CA May Revise) with a December 2025 delivery. Release 26.2 scope impact analysis is in progress. Early Trigger Date changed to 6/23/25 and Trigger Date changed to 7/23/25 since Release 26.6 scope definition is in progress.
- 4/25/2025 DHCS added CalHEERS CR 304049 to Release 26.2 Scope.
- 4/7/2025 New risk created

- Confirmed Release 26.2 Scope (Completed)
- Confirm Verify Lawful Presence Implementation release date (Completed moved out of 2026)
- Confirm scope for the remainder of 2026 (In Progress)
- Perform enhanced monitoring of internal and external schedule and delivery milestones adjusting scope and schedule as needed (In Progress)

## 316 - FAILURE TO EFFECTIVELY TRANSITION THE IDENTITY MANAGEMENT SOLUTION (PING IDENTITY) COULD RESULT IN SYSTEM ACCESS PROBLEMS FOR USERS

| DESCRIPTION  | OWNERS                                   |
|--|--|
| The identity management system controls access to a variety of CalSAWS systems. An ineffective transition may increase the risk of an outage or a slower resolution to an incident which will impact user satisfaction and their ability to perform work in a timely manner. | Dawn Wilder,<br>Lulu Fou,<br>Sandeep Aji |
|  |  |

| LEVEL  | Trending       | EARLY IMPACT DATE | TRIGGER DATE |
|--------|----------------|-------------------|--------------|
| MEDIUM | Remains same 💳 | 6/2/2025          | 6/9/2025     |

#### **LATEST STATUS NOTES**

- 5/20/2025 New risk created
- It is not anticipated that all mitigation actions would be completed. There are several mitigation actions identified to be pursued with the expectation that some would not come to fruition.
- All mitigation items are complete.

- Add additional shadowing to the transition plan.
- Engage the provider (Ping Identity) for standby support and to conduct an assessment of the current solution.
- Transition an Accenture staff member with Ping Identity expertise.
- Create troubleshooting documentation to increase the speed of incident diagnosis and resolution.
- Participate in a mock troubleshooting session.
- Maintain access to Accenture expertise for two weeks following transition.

## 317 - UPDATED MAY REVISE BUDGET MEDI-CAL REVISIONS EFFECTIVE JANUARY 1, 2026 MAY BE AT RISK FOR DELIVERY

| DESCRIPTION  | OWNERS  |
|--|---|
| As part of the State Fiscal Year 2025/2026 Revised Budget, two policy updates are expected to be implemented by January 1, 2026. These policy updates are the (1) Full-Scope Medi-Cal Enrollment Freeze for Non-Satisfactory Immigration Status and (2) Reinstatement of the Non-MAGI Medi-Cal Asset Limit Test. The Enrollment Freeze update will require coordination between the CalSAWS and CalHEERS Project. The implementation of these changes should not conflict with the SSA COLA Batch Run planned for December 2025. Without finalized staffing, policy, timeline, and environment plan, the delivery and implementation of these policy updates might be at risk. | Rajesh Tahaliyani, Jerry Nielson, Lulu Fou, Lisa Salas, Michele Peterson, Sharon Teramura, Emmeil Davis |

| LEVEL  | Trending       | EARLY IMPACT DATE | TRIGGER DATE |
|--------|----------------|-------------------|--------------|
| MEDIUM | Remains same 🖚 | 6/30/2025         | 9/1/2025     |

#### **LATEST STATUS NOTES**

- 5/27/2025: New Risk Created
- 5/22/2025: Submitted SIRFRA 1436 Age 19 & Over Adult Expansion Freeze and SIRFRA 1437
   Reinstatement of Asset Limit Test for Non-MAGI Medi-Cal

- Work with DHCS to finalize policy by June 30, 2025
- Acquire development/testing environment by June 30, 2025
- Coordinate with CalHEERS to finalize design/testing/deployment timeline by June 30, 2025
- Onboard and ramp-up Deloitte SME staff Finalize CalSAWS system change design by August 31, 2025