

# CalSAWS



## CalSAWS Risk Management Group (RMG) Off Cycle Report

July 30, 2025

# 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 317** - Updated May Revise Budget Medi-Cal Revisions effective January 1, 2026, may be at risk for Delivery

**Risk 318** - CARES conversion approach may require significant manual data conversion and/or data entry effort by the counties

**Risk 319** - Delays in the CARES conversion approach may impact CalSAWS transition activities

**Risk 320** - Failure to provide M&E team timely access for M&E may impact M&E release delivery - CalSAWS Environment for Releases

# CalSAWS RMG Risk Report – July 30, 2025

## GENERAL ANALYSIS

There are currently nine open risks documented in the SharePoint Risk Log. Four risks are at a medium risk level. The overall Project risk level of 1.64. Six risks have trigger dates occurring within the next 90 days.

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

PROBABILITY	IMPACT				
	1 Minimal	2	3	4	5 Unacceptable
90% Near Certainty	(0.9)	(1.8)	(2.7)	(3.6)	(4.5)
70% Highly Likely	(0.7)	(1.4)	(2.1)	(2.8)	(3.5)
50% Possible	(0.5)	(1.0)	(1.5)	(2.0)	(2.5)
30% Unlikely	(0.3)	(0.6)	(0.9)	(1.2)	(1.5)
10% Highly Unlikely	(0.1)	(0.2)	(0.3)	(0.4)	(0.5)

Legend: Low Medium High

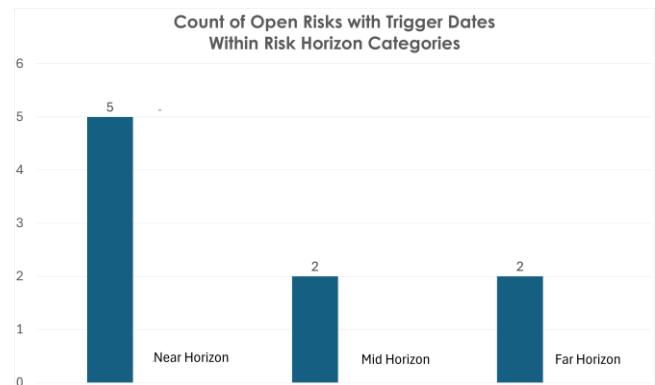
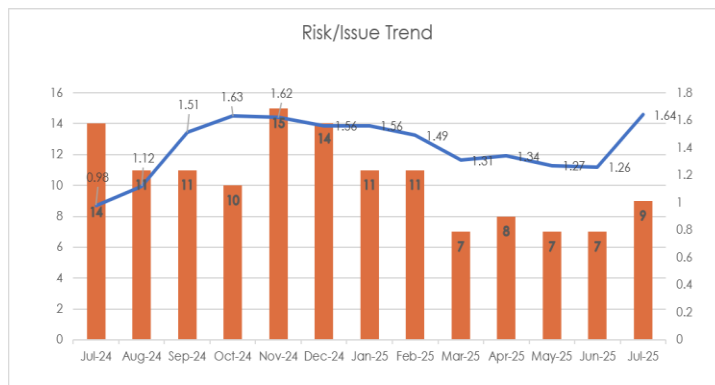
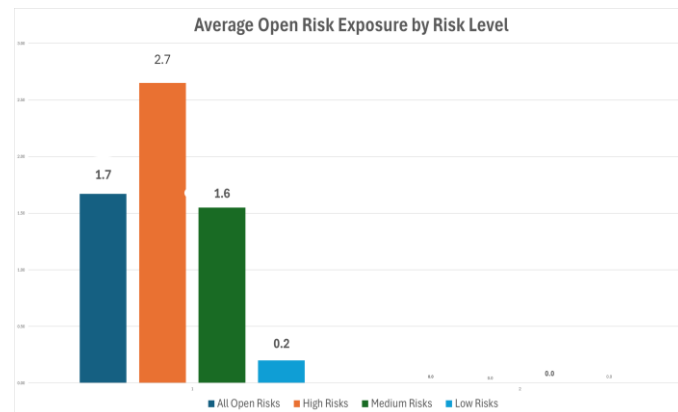



Figure 1 Overall Risk Level and Numerical Analysis

## 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
<ul style="list-style-type: none"> <li>July 1, 2025: January 2025 IAPDU was approved and the OAPDU was submitted for State review and approval. CPMO continues to monitor potential State and federal budget impacts.</li> <li>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.</li> <li>May 5, 2025: CPMO is working to respond to CMS comments and questions including the annual certification process to continue enhanced funding.</li> </ul>

CURRENT MITIGATION PLAN
<p>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:</p> <ul style="list-style-type: none"> <li>Verify monthly updates to the State's Master Automation Effort Tracker to identify gaps– Ongoing Monthly</li> <li>Prepare and submit Automated Budget Questionnaire (ABQ) – August/February</li> <li>Coordinate with State partners to address comments and questions – Fall and Spring budget cycles</li> <li>Verify proposed budget – January/May</li> <li>Address funding gaps – February/June</li> </ul>

## CALSAWS TRANSITION 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.**

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, Peggy Macias

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
Low	Remains same 	7/1/2025	10/1/2025

LATEST STATUS NOTES
<ul style="list-style-type: none"> <li>July 1, 2025: Vendor conducted product demo on June 17 with positive feedback, CPMO is assessing cost impacts. Additional product assessments planned for July.</li> <li>May 29, 2025: Designated Consortium staff will attend a product demonstration on June 17, 2025 to assess alignment with requirements.</li> <li>May 5, 2025: CPMO continues to identify requirements and is planning for upcoming product assessments.</li> </ul>

CURRENT MITIGATION PLAN
<p>March 6, 2025, Mitigation Plan: Update the web portal to improve access to information, improve user experience, and streamline organization of information:</p> <ul style="list-style-type: none"> <li>Develop requirements for a new web portal (CPMO/Customer Engagement, target May 1, 2025)</li> <li>Complete alternatives analysis of software options and assess costs (Gainwell Tools Team/CPMO/Customer Engagement, target June 1, 2025)</li> <li>Design and develop new web portal (Gainwell Tools Team/CPMO/Customer Engagement, target September 1, 2025)</li> <li>Develop standards and maintenance processes to support integrity of the web portal – (CPMO/Customer Engagement, target quarter 3 2025)</li> <li>Facilitate organizational change management and training – (CPMO/Customer Engagement, target quarter 3 2025)</li> <li>Implement new web portal, (Gainwell Tools Team/CPMO/Customer Engagement target quarter 4 of 2025)</li> </ul>

## M&O PRODUCTION RISK

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

DESCRIPTION	OWNERS
<p>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 &amp; Medicaid Services(CMS) and State regulations.</p> <p>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.</p> <p>Breadth of requirement impact on various systems include CalSAWS, BenefitsCal, CoveredCA, and MEDS.</p> <p><b>Milestone Schedule:</b></p> <ul style="list-style-type: none"> <li>■ CalSAWS/CalHEERS Requirements (Completed) – Baseline:February 25, 2025; Updated: March 13, 2025</li> <li>■ BenefitsCal Requirements Complete (Completed) – April 25, 2025</li> <li>■ CalHEERS Design Complete (Completed) – Baseline: March 14, 2025: Technical Docs Approved March 13, Functional Doc Pending Approval - Due March 12</li> <li>■ CalSAWS Design Complete (Completed) – May 1, 2025</li> <li>■ BenefitsCal Design Complete (Completed) – June 27, 2025</li> <li>■ CalSAWS/CalHEERS Integration Build Complete (Completed) - June 27, 2025</li> <li>■ BenefitsCal/CalSAWS Integration Build Complete (In Progress) - July 27, 2025</li> <li>■ CalSAWS/CalHEERS Integration Test (In Progress) - June 30, 2025 – August 15, 2025</li> <li>■ CalSAWS/BenefitsCal R25.09 Build Complete – July 25, 2025</li> <li>■ CalSAWS/BenefitsCal R25.09 System Test – July 28, 2025 – September 17, 2025</li> <li>■ CalSAWS/BenefitsCal R25.09 Release Date: September 22, 2025</li> <li>■ CalHEERS Release Date: September 22, 2025</li> </ul>	<p>Sharon Teramura, Fredrick Gains, Michele Peterson, Renee Gustafson, Onur Senman, Emmel Davis</p>

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
Low	Remains same ↔	7/25/2025	8/22/2025

#### LATEST STATUS NOTES

- 7/1/2025 - Risk Level changed to Low, Early Trigger Date changed to 7/25/25, and Trigger Date changed to 8/22/25 since SSApp is on track for 25.09 completion.
- 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.


#### 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)

## CALSAWS TRANSITION RISK

### 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 Salas, Rajesh Tahaliyani, Mike Henry, Holly Murphy, Yong Vangbliayang, Pandu Gupta

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
Low	Downward 	3/3/2025	11/24/2025

#### LATEST STATUS NOTES

- 6/27/2025: Accenture completed the Reverse Job Shadow for Design of Release 25.09. Continued to provide support for the remainder for RJS for Build and Test for Release 25.09. Commenced Back Shadow for Release 25.11. Deloitte has completed the Design and recently Consortium has requested Accenture review the Design and provide any material gaps/impact.;
- 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.

#### 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



#### CURRENT MITIGATION PLAN

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.

## M&O PRODUCTION RISK

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

DESCRIPTION	OWNERS
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
<b>MEDIUM</b>	<b>Remains same</b> 	<b>8/1/2025</b>	<b>9/5/2025</b>


LATEST STATUS NOTES
<ul style="list-style-type: none"> <li>7/1/2025 - CA May Revise December Release, Release 26.2 scope revision, and Release 26.6 scope completed. Early Trigger Date changed to 8/1/25 and Trigger Date changed to 9/5/25.</li> <li>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.</li> <li>4/25/2025 - DHCS added CalHEERS CR 304049 to Release 26.2 Scope</li> </ul>

CURRENT MITIGATION PLAN
<ul style="list-style-type: none"> <li>Confirmed Release 26.2 Scope (Completed)</li> <li>Confirm Verify Lawful Presence Implementation release date (Completed - moved out of 2026)</li> <li>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)</li> </ul>

## CALSAWS TRANSITION RISK

### 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
<b>MEDIUM</b>	Remains same 	<b>7/31/2025</b>	<b>9/1/2025</b>

#### LATEST STATUS NOTES


- 7/1/2025: DHCS policy received, development/test environment acquired, and CalHEERS SDLC timeline finalized. Early Impact Date changed to 7/31/25 since May Revise Revisions are on track for completion before 1/1/26.
- 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

#### CURRENT MITIGATION PLAN

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

### 318 - CARES CONVERSION APPROACH MAY REQUIRE SIGNIFICANT MANUAL DATA CONVERSION AND/OR DATA ENTRY EFFORT BY THE COUNTIES

DESCRIPTION	OWNERS
The conversion approach that the CARES project has put forward assumes that all case data for CARES-FCED programs exists in CWS/CMS or can be derived from existing data. Discussions to synchronize CalSAWS AAP and Kin-Gap case data that may be missing from CWS/CMS have been rejected thus far.	Michele Peterson, Rachel Hernandez, Jason Horton

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
HIGH	Upward 	9/1/2025	7/25/2025

LATEST STATUS NOTES
<ul style="list-style-type: none"> <li>7/25/2025 - Based on calls throughout the last 2 weeks, and due to the preliminary results of the first Foster Care extract from CARES, this Risk will be moved to an Issue to track the effort.</li> <li>7/11/2025 - The CARES project has committed to resolving the concerns in this risk by 7/25/2025. In the most recent conversion meeting (7/10), the approach laid out was in line with expectation for preventing county staff from being required to manually create cases for Kin-Gap and AAP programs.</li> <li>6/18/2025 - New Risk</li> </ul>

CURRENT MITIGATION PLAN
<ul style="list-style-type: none"> <li>Discuss alternative conversion approaches with the CARES/OTSI/CDSS leadership to avoid impacting counties by assuming a manual effort for a subset of the total AAP/Kin-Gap population.</li> </ul>

### 319 - DELAYS IN THE CARES CONVERSION APPROACH MAY IMPACT CALSAWS TRANSITION ACTIVITIES

DESCRIPTION	OWNERS
The transition of CalSAWS FCED responsibilities to the Deloitte team originally had a plan for the conversion logic to be fully vetted for requirements, designed and built prior to handing it over. As part of the plan the testing and execution pieces have always been planned to be transitioned. Due to the delays in finalizing the approach of the conversion effort, the design and build are more likely to be a part of the transition process.	Michele Peterson, Rachel Hernandez, Jerald Nielson, Jason Horton


LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
<b>MEDIUM</b>	Remains same 	<b>9/1/2025</b>	<b>10/31/2025</b>

LATEST STATUS NOTES
<ul style="list-style-type: none"> <li>7/25/2025 - No new updates</li> <li>7/11/2025 - No new updates</li> <li>6/18/2025 - New Risk</li> </ul>

CURRENT MITIGATION PLAN
<p>Accenture and Deloitte transition teams will work together to identify a plan for mitigating the risk. Potential options for mitigation are:</p> <ul style="list-style-type: none"> <li>More direct focus on the conversion transition</li> <li>Additional Deloitte resources identified for attending FCED conversion meetings</li> </ul>

### 320 - FAILURE TO PROVIDE M&E TEAM TIMELY ACCESS FOR M&E MAY IMPACT M&E RELEASE DELIVERY - CALSAWS ENVIRONMENT FOR RELEASES

DESCRIPTION	OWNERS
Deloitte staff may be unable to perform certain SDLC activities timely for the M&E releases beginning with 25.11 without access to releases specific CalSAWS environments and tools. (Split from Risk 313.)	Kiran Kotra, Jerald Nielson, Rajesh Tahaliyani, Dawn Wilder, Lulu Fou

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
<b>MEDIUM</b>	Downward 	<b>7/21/2025</b>	<b>7/28/2025</b>

LATEST STATUS NOTES
<ul style="list-style-type: none"> <li>7/1 - New Risk;</li> <li>7/1 - Update: One of the mitigation steps is for Deloitte to provide detailed ramp up of access and software license requirements to Gainwell. Accenture to work with Gainwell to provide ramp down and available licenses.;</li> <li></li> </ul>

CURRENT MITIGATION PLAN
<ul style="list-style-type: none"> <li>Plan is to resolve access and environment challenges for both on-shore and offshore team members prior to SDLC activities starting. Access includes Environment, Software licenses/tools and AWS specific access.</li> <li>7/14 - Environment Transition Dates are tracked here - <a href="https://calacesorg.sharepoint.com/:x:/r/sites/CalACES-Project/_layouts/15/Doc.aspx?sourcedoc=%7B5B6DFA0D-36BD-4E46-AE9B-F74CC77F0972%7D&amp;file=ME%20Environment%20Transition%20Plan%204.22.2025.xlsx&amp;action=default&amp;mobileredirect=true">https://calacesorg.sharepoint.com/:x:/r/sites/CalACES-Project/_layouts/15/Doc.aspx?sourcedoc=%7B5B6DFA0D-36BD-4E46-AE9B-F74CC77F0972%7D&amp;file=ME%20Environment%20Transition%20Plan%204.22.2025.xlsx&amp;action=default&amp;mobileredirect=true</a></li> </ul>