CalSAWS

CalSAWS Risk Management Group (RMG) Report

August 13, 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 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 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

Risk 321 - Uncertainty on approach for transmitting Vendor information to CalSAWS may impact large county automation

LIST OF OPEN ISSUES

Issue 318 - CARES KIN-GAP and Adoption Assistance Program (AAP) conversion approach requires significant manual data conversion and/or data entry effort by the counties

CalSAWS RMG Risks and Issues Report - July 30, 2025

GENERAL ANALYSIS

There are currently eight open risks documented in the SharePoint Risk Log. Four risks are at a medium risk level. Four risks have trigger dates occurring within the next 90 days. The overall Project risk level for all open risks is 1.50.

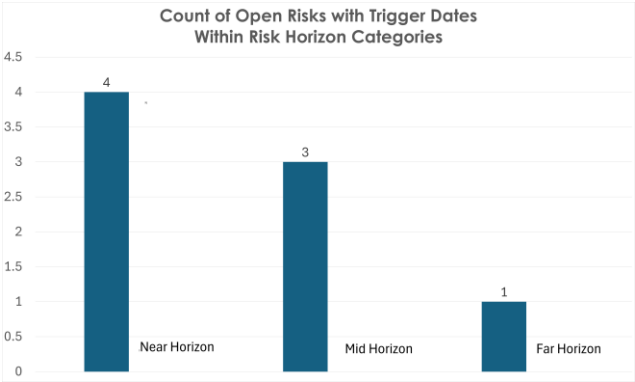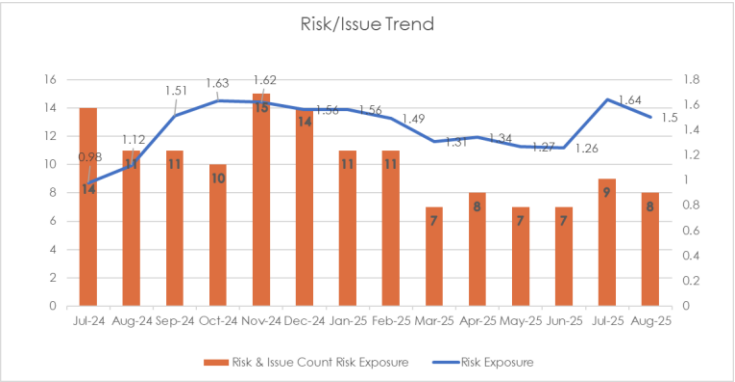There is currently one open issue within the SharePoint Issue log for this reporting period.
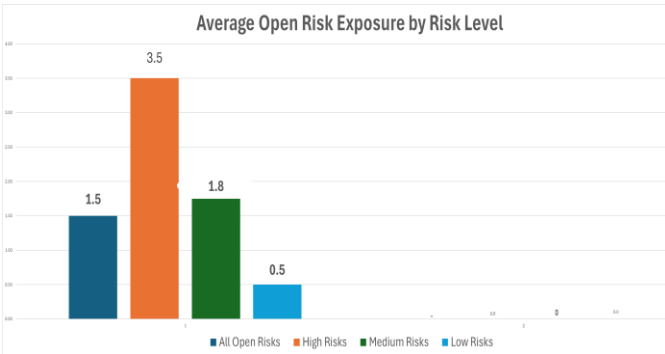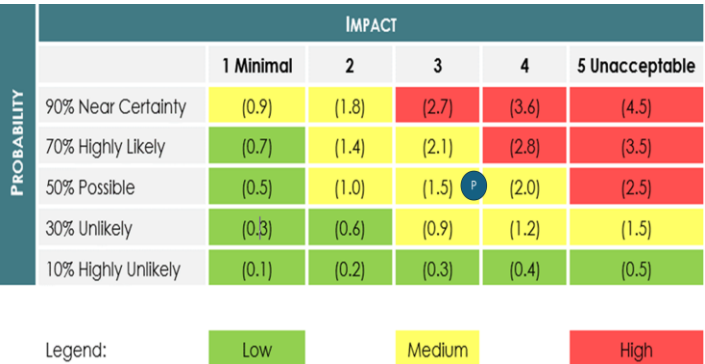

Figure 1Overall Risk Level and Numerical Analysis

CalSAWS Maintenance and Operations

RISK 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	Upward ⬆	10/10/2025	1/10/2026

LATEST STATUS NOTES

- Aug 8, 2025: HR1 was passed with impact to funding participation rates, increasing the State's share of cost. Direction from the State on updates to the CAP is pending but increases the probability of this risk due to impacts on State general fund. CPMO continues to monitor and address questions/comments associated with OAPDU review and approval.
- 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.
- 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.

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

CalSAWS Transition Risk

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⬄	12/31/2025	2/28/2026

Latest Status Notes

- Aug 8, 2025: Alternatives analysis has continued to compare products. CPMO reviewed protype developed by Gainwell to provide feedback for expanded demonstration with the Consortium. Timeline has been updated to ensure adequate time to coordinate across the all teams including including Tech Ops and Security/Privacy for governance aspects of the future solution, as well as change management/training for project and county staff.
- July 1, 2025: Vendor conducted product demo on June 17 with positive feedback, CPMO is assessing cost impacts. Additional product assessments planned for July.
- May 29, 2025: Designated Consortium staff will attend a product demonstration on June 17, 2025 to assess alignment with requirements.

Current Mitigation Plan

March 6, 2025/Aug 8, 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 - Completed)
- Complete alternatives analysis of software options and assess costs (Gainwell Tools Team/CPMO/Customer Engagement, target August 31, 2025)
- Design and develop new web portal (Gainwell Tools Team/CPMO/Customer Engagement, target November 1, 2025)

CURRENT MITIGATION PLAN
- Develop standards and maintenance processes to support integrity of the web portal – (CPMO/Customer Engagement, target November 1 2025)   - Facilitate organizational change management and training – (CPMO/Customer Engagement, target December 2025)   - Implement new web portal, (Gainwell Tools Team/CPMO/Customer Engagement target January 2026) (schedule is subject to final selection of tool)

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

Description	Owners
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 (Completed) – June 27, 2025 ■ CalSAWS/CalHEERS Integration Build Complete (Completed) - June 27, 2025 ■ BenefitsCal/CalSAWS Integration Build Complete (Completed) - July 27, 2025 ■ CalSAWS/CalHEERS Integration Test (In Progress) - June 30, 2025 – August 15, 2025 ■ CalSAWS/BenefitsCal R25.09 Build Complete (Completed) – July 25, 2025 ■ CalSAWS/BenefitsCal R25.09 System Test (In Progress) – July 28, 2025 – September 17, 2025 ■ CalSAWS/BenefitsCal R25.09 Release Date: September 22, 2025 ■ CalHEERS Release Date: September 22, 2025	Sharon Teramura, Fredrick Gains, Michele Peterson, Renee Gustafson, Onur Senman, Emmeil Davis

Level	Trending	Early Impact Date	Trigger Date
Low	Remains same ⬌	7/25/2025	8/22/2025

LATEST STATUS NOTES

- 8/1/2025 - SSApp is on track for 25.09 completion
- 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.

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 Maintenance and Operations

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
Low	Downward	9/1/2025	10/3/2025

Latest Status Notes
■ 8/7/2025 - Efforts progressing on track resulting in risk trending lower and changed from medium to low. Early Trigger Date changed to 9/1/25 and Trigger Date changed to 10/3/25; ■ 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; ■ 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

Current Mitigation Plan
■ Confirmed Release 26.2 Scope (Completed)

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CURRENT MITIGATION PLAN
■ 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)

CalSAWS Transition Risk

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.	Deloitte – Rajesh Tahaliyani, Jerry Nielson; Accenture – Lulu Fou, Lisa Salas; Consortium – Michele Peterson, Sharon Teramura; QA – Emmeil Davis

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Remains same ⬄	8/8/2025	10/20/2025

LATEST STATUS NOTES

- 8/7/2025: Design in progress. Early Impact Date changed to 9/8/25 and Risk Trigger Date changed to 10/20/2025 since May Revise Revisions are on track for completion before 1/1/26.
- 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

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 (Completed)
- Finalize CalSAWS system change design by August 31, 2025 (In Progress)

CalSAWS Transition Risk

RISK 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
MEDIUM	Remains same ⬌	9/1/2025	10/31/2025

Latest Status Notes

- 8/8/2025 - No new updates
- 7/25/2025 - No new updates
- 7/11/2025 - No new updates

Current Mitigation Plan

Accenture and Deloitte transition teams will work together to identify a plan for mitigating the risk. Potential options for mitigation are:

- More direct focus on the conversion transition
- Additional Deloitte resources identified for attending FCED conversion meetings

CalSAWS Maintenance and Operations

RISK 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, Pandu Gupta

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Downward ⬇	**7/21/2025**	**9/8/2025**

LATEST STATUS NOTES

- 7/29 - Development Environments are transitioned. Next Set of environments is for Sys and other higher environments.
- 7/14 - Environment Transition Plan spreadsheet link added to "Risk Mitigation Plan" section
- 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.

CURRENT MITIGATION PLAN

- 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.
- Environment Transition Dates are tracked here - https://calacesorg.sharepoint.com/:x:/r/sites/CalACES-Project/_layouts/15/Doc.aspx?sourcedoc=%7B5B6DFA0D-36BD-4E46-AE9B-F74CC77F0972%7D&file=ME%20Environment%20Transition%20Plan%204.22.2025.xlsx&action=default&mobileredirect=true

RISK 321 - UNCERTAINTY ON APPROACH FOR TRANSMITTING VENDOR INFORMATION TO CALSAWS MAY IMPACT LARGE COUNTY AUTOMATION

Description	Owners
During development of the FCED/CARES APIs, the CalSAWS project identified a concern with the proposed approach for sharing vendor information from the CARES system. The CalSAWS approach is that vendors, which are stored in the Resource Data Bank (RDB), are designed to be entered once and then associated to cases that are using that vendor. CARES Vendor = CalSAWS Foster Care Resource, which becomes the Placement and payee on the Foster Care program. The CARES project approach is to store vendor information at the case level, which will duplicate data across cases that use the same vendor. The approach would require county staff to coordinate updates to RBD across all placements that utilize it. This could mean coordination across offices within a single county or coordination across multiple counties if a CalSAWS Foster Care Resource is servicing multiple cases across counties. The CalSAWS FCED team suggested creating a separate Vendor API to share vendor information separate from the Placement data. This approach would prevent vendor data for the same resource being sent for each case that uses it. The CARES project has yet to agree to a Vendor API approach which puts the development of large county automation at risk due to the uncertain final design of the logic. Additionally, the lack of final approach makes it increasingly likely that the CalSAWS Deloitte team will be getting the automation logic half completed during transition instead of complete, as planned. If the Vendor API fails to be built prior to initial implementation of the FCED interface, counties will be required to take significant manual steps to create the vendor in Resource Data Bank (RDB) prior to processing any placement information from CARES. Beyond the manual effort, this could delay benefits to customers while the manual processing of resource data takes place.	Michele Petersen, Rachel Hernandez, Jerald Nielson, Ayana Alvarez, Jason Horton

Level	Trending	Early Impact Date	Trigger Date
MEDIUM	Remains same ⬌	8/1/2025	9/1/2025

Latest Status Notes
■ 8/8/2025 - The CARES project is continuing to meet internally and with County staff to determine if the Vendor API is required for V1 development.
■ 7/25/2025 - Based on conversations with CARES, it appears that there is consensus on the need for a Vendor API. The project has yet to commit to a delivery date, so this risk will

LATEST STATUS NOTES

stay with its current trigger date and profile. Update early impact date to 8/1/2025 and Trigger date to 9/1/2025.
- 7/9/2025 - New Risk Logged

CURRENT MITIGATION PLAN

Continue to work with the CARES project to explore the best approach for sharing vendor information through the FCED/CARES APIs.   Coordinate possible business process changes for large counties that will opt in for the automation approach.

CalSAWS Maintenance & Operations Issue

ISSUE 318 - CARES KIN-GAP AND ADOPTION ASSISTANCE PROGRAM (AAP) CONVERSION APPROACH REQUIRES 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 enough case data for Kin-GAP and Adoption Assistance Program (AAP) programs exist in CWS/CMS or can be derived from existing data to create a shell case. Discussions to synchronize CalSAWS AAP and Kin-GAP case data that may be missing from CWS/CMS have yet to be resolved with CARES in a positive outcome, increasing the level of manual work staff will undertake to make the case whole and synchronize the data in both CARES and CalSAWS systems The CARES-FCED Foster Care program conversion approach was previously approved. The initial Foster Care data extract from the CARES project was received on July 1, 2025. The match rate for CalSAWS cases and individuals was extremely low. CalSAWS' analysis and reconciliation of the extract indicate that the approved conversion approach for Foster Care should be revisited, as it may be more complex than initially anticipated—both for the project and potentially for county staff. Given that Foster Care is the primary eligibility program tracked through FCED, with more detailed data available in CWS/CMS, the low match rate highlights a misalignment in expectations regarding CARES data extraction, deduplication, and formatting.	Michele Petersen, Rachel Hernandez, Jason Horton, Jerald Nielson

PRIORITY	DATE IDENTIFIED	RESOLUTION DUE DATE	ESCALATION DATE
HIGH	**7/25/2025**	**8/15/2025**	**7/25/2025**

LATEST STATUS NOTES
▪ 7/30/2025 - Risk 318 transitioned to Issue 318

CURRENT ISSUE RESOLUTION PLAN
Weekly conversion discussions with CARES to identify a path forward for Conversion which will require the least amount of manual entry by county staff have identified three possible outcomes. Kin-GAP and AAP Conversion Options:

- The CARES project has suggested that utilization of the APIs to do most of the conversion is the best option. The CalSAWS project disagrees with this approach because there are too

many concerns with using the APIs to perform high volume data synchronization when they were designed to send daily update volume only

- The CalSAWS project has suggested that CARES do a full ingestion of the eligibility data pulled from CalSAWS to give the most data possible to the CARES system to avoid a need for any downstream data conversions or manual entry. CARES has objected to this approach due to resource constraints/time/etc. Additionally, they have indicated that there is concern for data desynchronization due to some counties' timelines for adopting CARES as the system for Social Services Workers to track Kin-GAP and AAP cases.

- The CalSAWS project has requested the absolute minimum number of data points that the CARES project would need to establish a link to CalSAWS and still have enough data to continue day-to-day business so that the CARES project can ingest that information from a CalSAWS extract. This approach is still in discussion. With this solution CARES has also indicated that there is concern for data desynchronization due to some countries' timelines for adopting CARES as the system for Social Services Workers to track Kin-GAP and AAP cases.