

CalSAWS



CalSAWS Risk Management Group (RMG) Report – Off Cycle

August 27, 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 322 - Shared environments between Accenture and Deloitte may impact M&E 25.11 release delivery

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

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

CalSAWS RMG Risks and Issues Report – August 27, 2025

GENERAL ANALYSIS

The average Project risk exposure level due to all open risks (9) and issues (2) is now at 1.8.

Below are charts summarizing various aspects of these risks and issues. Figure 1 Risk/Issue Exposure Levels charts the risk numbers and their corresponding risk exposures and shows the progression from lowest probability/ risk exposure to the highest. Most of the risks have a probability of occurring of 50% or less. The issues shown are at 100% probability, since they are actualized risks. Figure 2 shows the trend of risk/issues counts and overall average project risk exposure over the past year. There are four risks at a medium risk level. Figure 5 Count of Open Risks with Trigger Dates Within Risk Horizon Categories shows that there are four risks having trigger dates occurring within the next 90 days (Near Horizon).

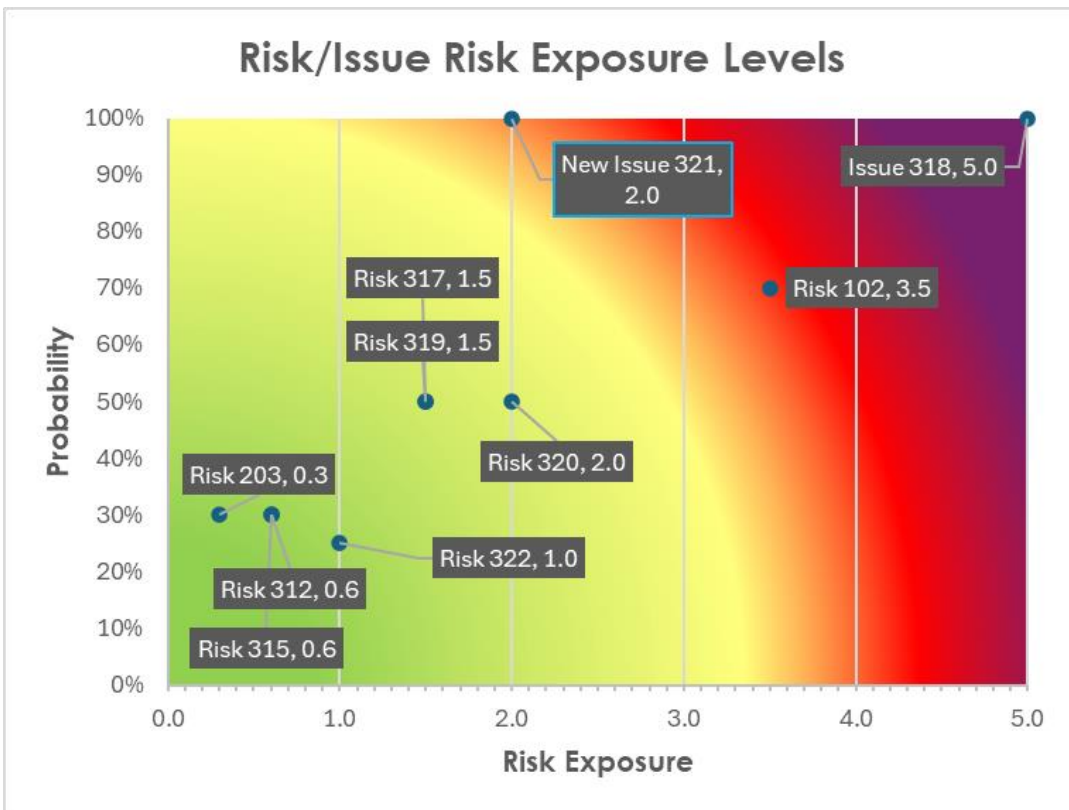


Figure 1 Risk and Corresponding Risk Exposure

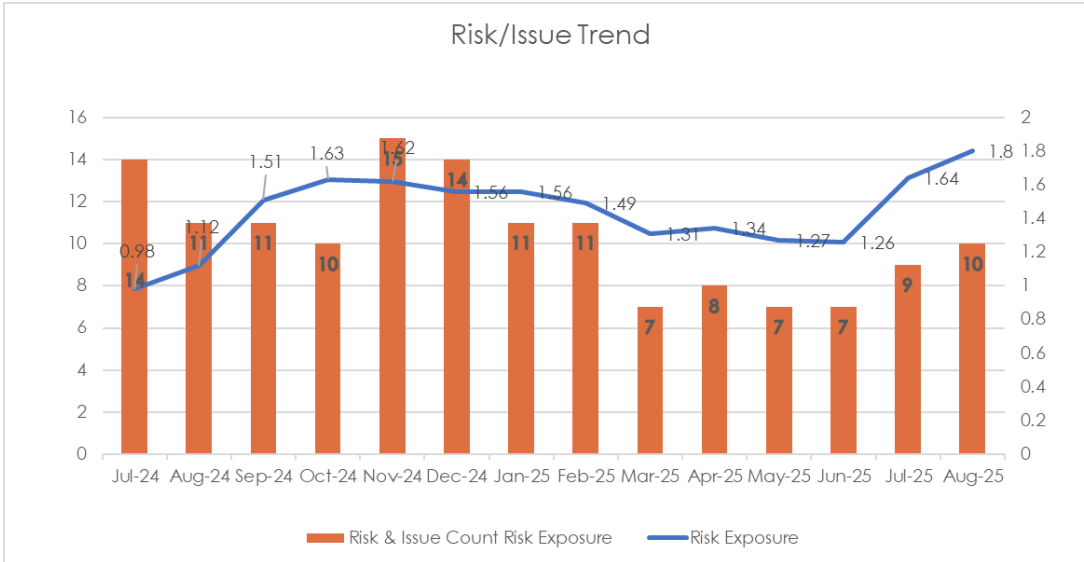


Figure 2 Overall Risk Level and Numerical Analysis

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) P	(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 3 Probability / Impact

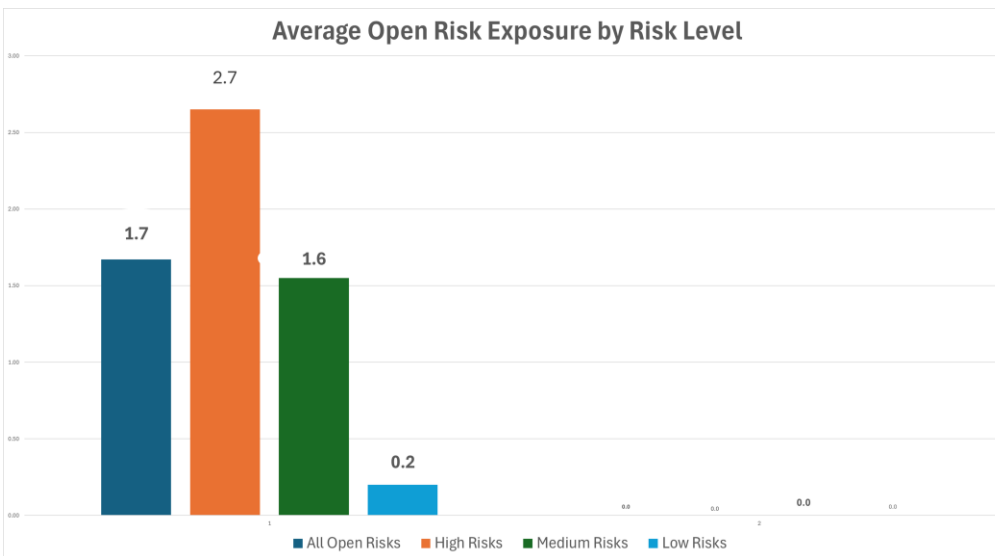


Figure 4 Avg of Open Risk Exposures within Risk Level Category

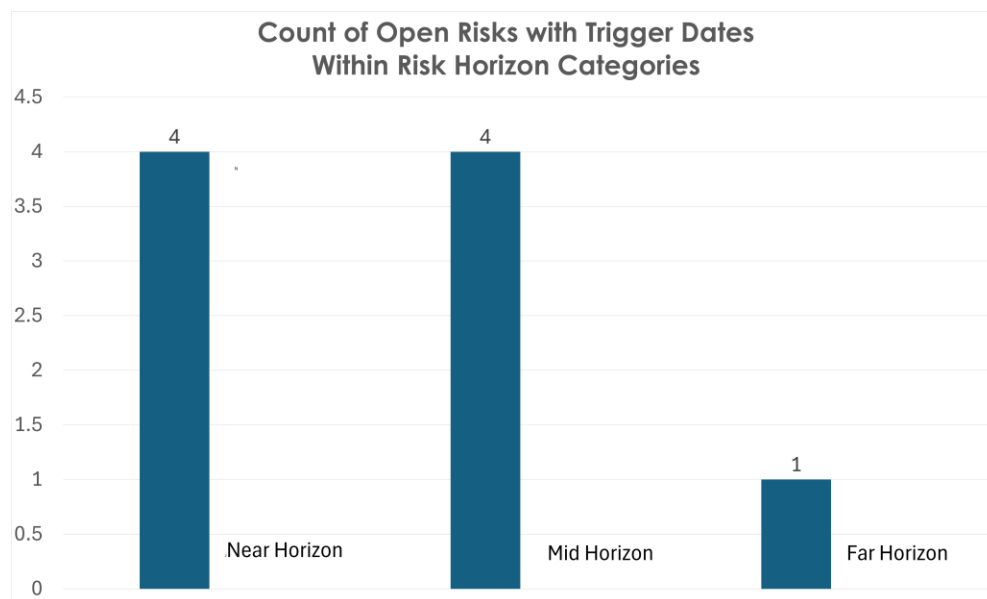



Figure 5 Count of Open Risks with Trigger Dates Within Risk Horizon Categories

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	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

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
<ul style="list-style-type: none"> ■ Aug 8, 2025: Alternatives analysis has continued to compare products. CPMO reviewed prototype 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
<p>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:</p> <ul style="list-style-type: none"> ■ 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)

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 & 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>Milestone Schedule:</p> <ul style="list-style-type: none"> ■ 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 	<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

- 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)

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

LATEST STATUS NOTES
<ul style="list-style-type: none"> 8/7/2025 - Efforts progressing on track resulting in risk trending lower and changed from medium to low. Early Impact 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 Impact 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 Impact 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
<ul style="list-style-type: none"> 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)

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
<ul style="list-style-type: none"> 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
<ul style="list-style-type: none"> 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)

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
<ul style="list-style-type: none"> 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 TRANSITION 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, Sumeet Patil, Jason Horton, Pandu Gupta

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


LATEST STATUS NOTES
<ul style="list-style-type: none"> 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
<p>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 –</p> <p>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</p>

M&O PRODUCTION RISK

322- SHARED ENVIRONMENTS BETWEEN ACCENTURE AND DELOITTE MAY IMPACT M&E 25.11 RELEASE DELIVERY

DESCRIPTION	OWNERS
As we transition to CalSAWS release environments and tools, certain environments and tools may need to be jointly accessed and used by both Accenture and Deloitte teams. This shared access/usage may potentially lead to code conflicts, unauthorized data changes, application issues, security and performance issues due to increased user load, system outages in production or lower environments impacting productivity/delivery timeframes. This can impact the M&E release 25.11.	Kiran Kotra, Derek D'Andrea, Rajesh Tahaliyani, Roger Perez, Sumeet Patil, Jason Horton, Rachel Hernandez

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Downward 	8/15/2025	9/10/2025

LATEST STATUS NOTES
<ul style="list-style-type: none"> 8/22 - Finalized the plan for Performance and CalHEERS environment and updated to the Risk Mitigation Plan. 8/10 - Deloitte and Accenture had multiple calls over the past week to finalize the environment sharing model. Performance and CH2 (CalHEERS environment) are the ones pending and for rest of them team was able to finalize the initial plan.

CURRENT MITIGATION PLAN
<p>Deloitte will collaborate with Accenture to develop a comprehensive plan for the shared environment model. This plan will clearly define each vendor's responsibilities, outline coordination mechanisms, and establish right governance for the entire process 8/22 - Mitigation Plan is updated on the SharePoint</p> <p>https://calacesorg.sharepoint.com/:x:/r/sites/CalACES-Project/_layouts/15/Doc.aspx?sourcedoc=%7BC416E93A-3D02-4E5E-AFE4-1B769A805B7B%7D&file=Mitigation%20Plan%20for%20Risk%20322.xlsx&action=default&mobiledirect=true</p>

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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 Peterson, 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
<ul style="list-style-type: none"> 8/8/2025 - Additional conversion extracts have been received from CARES for review. We received a replacement file with Foster Care data as well as initial AAP and KinGap extracts. The CalSAWS team is working on loading each into a database for review and analysis.; 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.

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ISSUE 321- CARES IS UNABLE TO SUPPORT TRANSMITTING VENDOR INFORMATION TO CALSAWS IN A SEPARATE API UNTIL POST-PRODUCTION GO-LIVE

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 Vendor/Resource information will be sent with placement data which will duplicate updates across all placements which that vendor/resource supports. Additionally, the existing large county automation design is dependent upon receipt of the vendor/resource information separate from the placement updates.	Michele Peterson, Rachel Hernandez, Jason Horton, Jerald Nielson

PRIORITY	DATE IDENTIFIED	RESOLUTION DUE DATE	ESCALATION DATE
HIGH	8/12/2025		8/13/2025

LATEST STATUS NOTES
<ul style="list-style-type: none"> 8/13/2025 - Updated Risk 321 to Issue 321

CURRENT ISSUE RESOLUTION PLAN
Internal CalSAWS strategy/approach sessions (initial meeting scheduled for 8/13/2025) are being held to identify options to proceed with FCED design and development. The resolution plan will be updated with outputs from the strategy session.