

# CalSAWS



## CalSAWS Risk Management Group RMG Report

January 14, 2026

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

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

**Risk 324** - Delay in communication may impact CalSAWS participation in the process simulation activity prior to the pilot go-live

**Risk 325** - Lack of approved federal funding may impact FCED pilot implementation activities

**Risk 326** - Lack of timely policy guidance may impact Medi-Cal HR1 delivery schedule

## LIST OF OPEN ISSUES

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

**Issue 323** - Integrated Performance Testing with CARES has unclear execution timeline and approach

# CalSAWS RMG Risks and Issues Report – January 14, 2026

## GENERAL ANALYSIS

The overall average Project risk exposure level, due to seven open risks and two open issues, is now at 1.72.

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

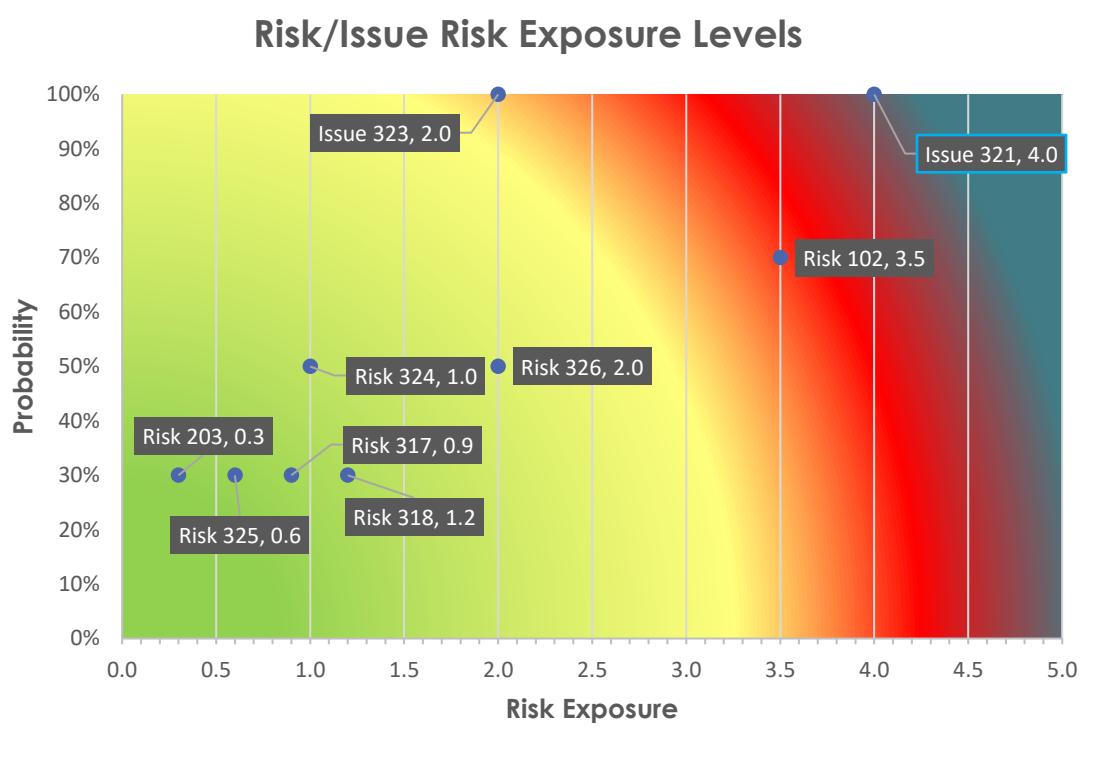


Figure 1 Risk and Corresponding Risk Exposure

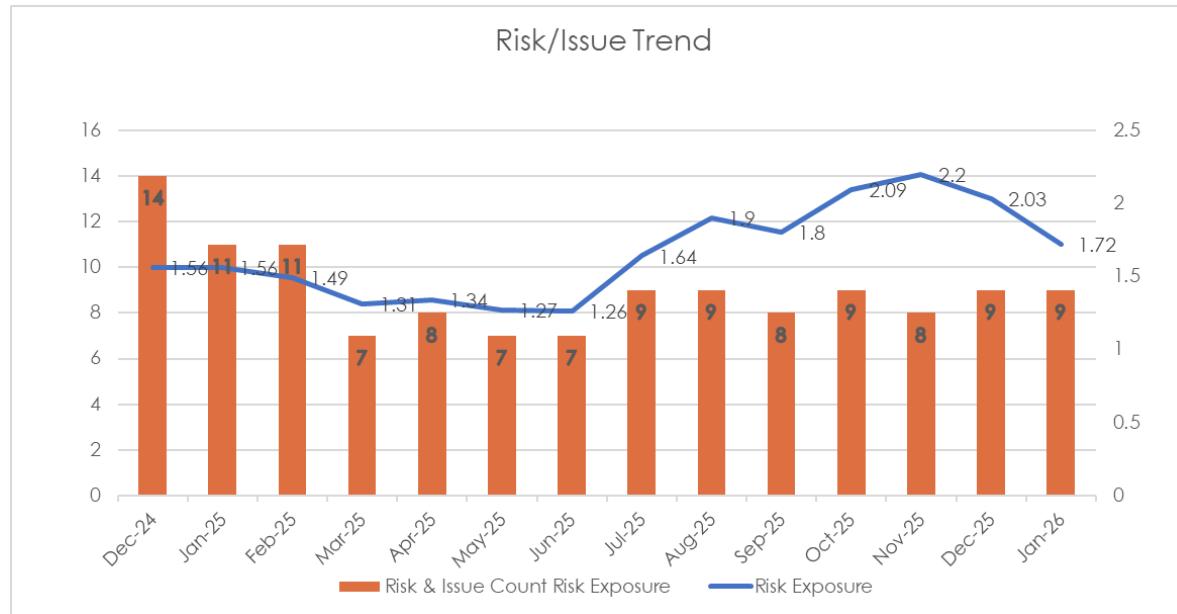


Figure 2 Overall Risk Level and Numerical Analysis

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)	(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

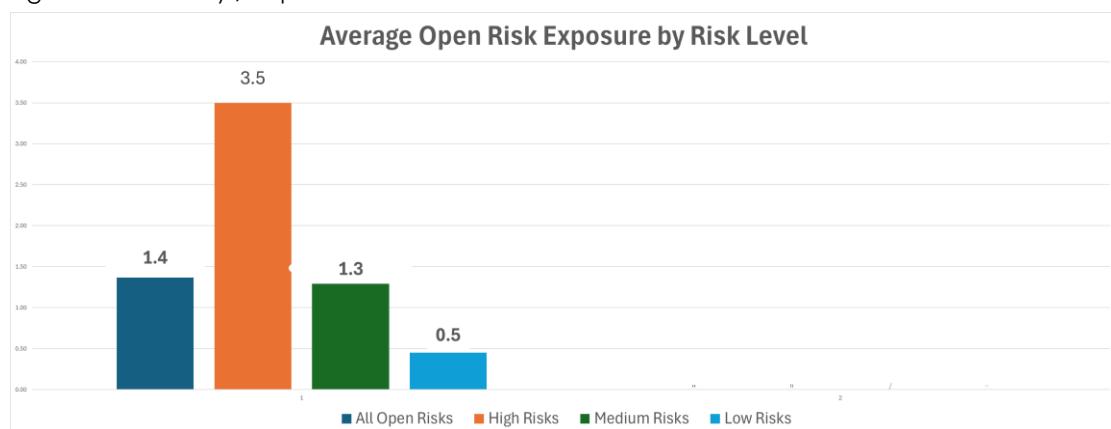


Figure 4 Avg of Open Risk Exposures within Risk Level Category

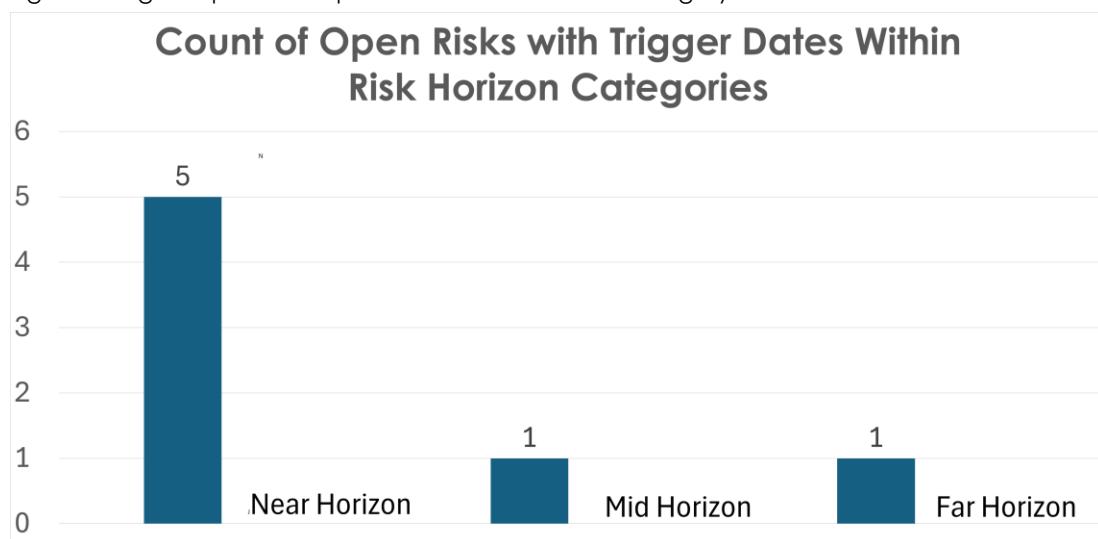


Figure 5 Count of Open Risks with Trigger Dates Within Risk Horizon Categories

## CALSAWS MAINTENANCE AND OPERATIONS

### 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	Remains same 	5/8/2026	7/1/2026

#### LATEST STATUS NOTES

- Jan 12, 2026: CPMO verified CalSAWS base funding was included in the January Proposed Budget and is working with the State on certain premise variations that will need to be resolved in the May Revise.
- Dec 15, 2025: CPMO continues to monitor and work with State partners to address questions.
- Nov 13, 2025: OAPDU was approved, CPMO will confirm funding requests are complete with release of the Governor's Proposed Budget in January.

#### 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 ➡➡	1/31/2026	2/28/2026

LATEST STATUS NOTES
<ul style="list-style-type: none"> <li>Jan 12, 2026: Content development continues, plans for pilot/test are underway to take place end of January.</li> <li>Dec 15, 2025: Drafts of new home page and project workspace have been completed, development of actual content is progressing dependent on PDO and completion of integrated work plan. Mitigation plan updated to reflect January pilot with subsequent implementation to follow.</li> <li>Nov 13, 2025: Updated mitigation plan schedule, no change to implementation date for phase 1. Home Page and Project Workspace pages draft near complete.</li> </ul>

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"> <li>Develop requirements for a new web portal (CPMO/Customer Engagement, target May 1, 2025 - Completed)</li> <li>Complete alternatives analysis of software options and assess costs (Gainwell Tools Team/CPMO/Customer Engagement, target August 31, 2025 - Completed)</li> <li>Design and develop new web portal (Gainwell Tools Team/CPMO/Customer Engagement, target December 31, 2025)</li> <li>Develop standards and maintenance processes to support integrity of the web portal – (CPMO/Customer Engagement, target January 31 2026)</li> </ul>

### CURRENT MITIGATION PLAN

- Facilitate organizational change management and training – (CPMO/Customer Engagement, target Feb 2026)
- Implement new web portal pilot (Gainwell Tools Team/CPMO/Customer Engagement target January 2026)

## CalsAWS TRANSITION RISK

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

DESCRIPTION	OWNERS
<p>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.</p>	Rajesh Tahaliyani, Jerry Nielson, Lulu Fou, Lisa Salas, Michele Peterson, Sharon Teramura, Emmeil Davis

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Downward 	11/14/2025	12/1/2025

#### LATEST STATUS NOTES

- 1/13/2026: CalsAWS and BenefitsCal system changes were delivered to production. Recommend risk be closed.
- 12/15/2025: CalsAWS and BenefitsCal on track for production delivery on 12/21/2025. CalsAWS and BenefitsCal system test changed to 12/19/2025.
- 11/14/2025: BenefitsCal development completed. Risk exposure reduced from 1.5 to 0.9. CalsAWS system test changed from 11/19/2025 to 12/5/2025.

#### 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 (Completed)
- Complete CalsAWS system change development by October 17, 2025 (Completed)
- Complete BenefitsCal system change development by November 7, 2025 (Completed)
- Complete CalsAWS system test by December 19, 2025 (In Progress)
- Complete BenefitsCal system test by December 19, 2025 (In Progress)

## M&O

### RISK 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

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Downward 	7/14/2025	7/25/2025

LATEST STATUS NOTES
<ul style="list-style-type: none"><li>1/12/2026: The AAP case-link match rate stands at 96% (based on the CalSAWS extract from 12/5/2025), and the KinGAP match rate is at 87% (from the 11/4/2025 extract), with both programs showing a very low percentage of residual unmatched cases. The teams will continue to perform matching exercises every month and discuss next steps for the county reviews. Risk 318 is re-opened for monitoring and its corresponding issue 318 has been closed (de-escalated).</li><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></ul>

CURRENT MITIGATION PLAN
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.

## CalsAWS Transition Risk

### RISK 324 - DELAY IN COMMUNICATION MAY IMPACT CALSAWS PARTICIPATION IN THE PROCESS SIMULATION ACTIVITY PRIOR TO THE PILOT GO-LIVE.

DESCRIPTION	OWNERS
<p>CARES requested CalSAWS participation and support in a Process Simulation activity prior to the pilot go-live, representing an additional scope of work. CARES implementation activities—including the Pilot, Process Simulation, Training, and Sandbox—are currently paused due to the October 1, 2025, Federal shutdown, impacting the CARES request for additional funding. CARES has confirmed that all discussions regarding the Process Simulation will remain on hold until further notice. This delay in coordinating Process Simulation activities have several downstream impacts, including potential effects on overall project schedule, resource allocation, joint testing, environment allocations and configuration, and funding needs to accommodate the expanded CalSAWS scope. Furthermore, funding for the CalSAWS STG6 environment is currently set to expire in May 2026 and allocated for County EUST3 testing between February and March 2025. Without clear Process Simulation timelines, there is a risk that an environment is not available and/or additional funding may be required to procure or extend environment availability in support of Process Simulation. Additionally, the current assumption is that Process Simulation would be conducted using unmasked production data, which is not compliant with the terms of the existing I-MOU between CalSAWS and CARES, and will require resolution before Process Simulation activities can proceed.</p>	Michele Petersen, Rachel Hernandez, Jerald Nielson, Ramya Raghunathan

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Upward 	1/1/2026	2/1/2026

LATEST STATUS NOTES
<ul style="list-style-type: none"> <li>1/12/2026: CalSAWS responded to SCERFRA 25-540 to support production simulation on live production data with required PII controls. This production simulation will replace the previous process simulation. Confirmation from CARES/CDSS is pending.</li> <li>12/15/2025: CARES is evaluating a Production Simulation activity. This activity is tentatively scheduled to run from May 2026 to October 2026 (go-live). CalSAWS cannot support the use of unmasked production data in non-production environments. This position aligns with the CalSAWS Data Masking Policy and the interim MOU between CalSAWS and CARES further requires that all joint development activities occur only in non-production environments using synthetic data. The teams will continue to explore collaboratively on</li> </ul>

## LATEST STATUS NOTES

how to support the business need from a CalSAWS standpoint while still maintaining necessary privacy and security controls for sensitive PII beneficiary data.

## CURRENT MITIGATION PLAN

The CalSAWS project team can:

- Starting January 2026, identify Process Simulation testing activities that can be done within CalSAWS using current funding, to prepare for future work.
- Starting February January review and document options to extend or replace the CalSAWS STG6 environment before funding ends in May 2026, so solutions are ready when planning resumes.
- Once Process Simulation process discussion esume , coordinate with CARES to determine how masked production data can be used for Process Simulation in CalSAWS.

## M&O PRODUCTION RISK

### RISK 325 - LACK OF APPROVED FEDERAL FUNDING MAY IMPACT FCED PILOT IMPLEMENTATION ACTIVITIES.

DESCRIPTION	OWNERS
<p>Due to the federal shutdown beginning on October 1, 2025, CWS-CARES has not submitted their APDU to ACF for approval. Without approved federal funding and the uncertainty surrounding the federal shutdown, work on specific implementation activities including CWS-CARES Pilot, Process Simulation, Training, and Sandbox will be paused while CDSS continues to assess options. CARES FCED pilot is currently scheduled between 8/28/26 – 10/9/26. The hold on Federal funding may impact on planned CalSAWS support and readiness activities including system changes, pilot planning, and training activities that are essential for a successful Pilot.</p>	Michele Petersen, Rachel Hernandez, Jerald Nielson, Ramya Raghunathan

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
Low	Remains same 	2/1/2026	4/1/2026

LATEST STATUS NOTES
<ul style="list-style-type: none"> <li>1/12/2026: Awaiting updates from CARES/CWDA on the CARES pilot execution. Team will continue to monitor updates.</li> <li>12/15/2025: Awaiting updates from CARES/CWDA on the CARES pilot execution. Team will continue to monitor for updates.</li> <li>11/17/2025: CARES is evaluating a Production Simulation activity, as opposed to a Process Simulation, using an unmasked production copy. This activity is tentatively scheduled to run from May 2026 to August 2026 (pilot), or from May 2026 to October 2026 (go-live). CARES has requested CalSAWS participation. As previously outlined, the same considerations for CalSAWS regarding STG6 environment availability post-May 2026 remain applicable including the need for a new funding extension. SCERFRA 25-536 received. Additionally, the restriction remains that CalSAWS cannot connect to any environment containing unmasked production data.</li> </ul>

CURRENT MITIGATION PLAN
<p>The CalSAWS project team can</p> <ul style="list-style-type: none"> <li>Starting February 2026, revisit timeline and determine if planning for Pilot activities can resume and be done within CalSAWS using current funding, to prepare for future work.</li> <li>Identify and perform feasible system changes, organizational change management (OCM), and training development activities between Dec 2025 – July 2026, that may be completed in isolation (within the CalSAWS system) using currently approved funding, in preparation for the Pilot.</li> </ul>

## CURRENT MITIGATION PLAN

- Additional contingencies and mitigations will be evaluated, as needed, between April 2026 – July 2026, for system and OCM changes that requires CARES coordination and cannot be completed due to the funding hold.

## CALSAWS MAINTENANCE AND OPERATIONS

### RISK 326 - LACK OF TIMELY POLICY GUIDANCE MAY IMPACT MEDI-CAL HR1 DELIVERY SCHEDULE

DESCRIPTION	OWNERS
<p>Effective October 1, 2026 through January 1, 2027, House Resolution 1 (HR1) introduces several Medi-Cal policy changes, including new work requirements, moving from annual to six-month redetermination, for specific populations, an amended definition of Qualified Non-Citizens, and reduced retroactive Medi-Cal period. These changes add complexity to how individual and household details are used when determining eligibility, impacting county intake, change reporting, and renewal processes. Implementation depends on CMS guidance, which is pending. The redetermination and work requirement policy changes must be implemented by November 1, 2026 to be included in the January 2027 renewal packets. The changes above will affect several areas within CalSAWS and BenefitsCal, as well as county operations. Without timely policy guidance, project planning and delivery timelines may be affected. To help manage these risks, the following mitigation efforts have been put in place.</p>	Pragati Sharma

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Remains same ➡➡	2/27/2026	4/16/2026

#### LATEST STATUS NOTES

- 1/13/2026 - 26.09 final policy received, 26.09 design is in progress
- 12/15/2025 - Risk created

#### CURRENT MITIGATION PLAN

- Use an Agile SDLC approach per agreement with DHCS, CalHEERS, and CalSAWS – Completed
- Create delivery schedule, including cross-organization dependencies (e.g., CalSAWS Project, DHCS, CalHEERS, and BenefitsCal) – Completed
- DHCS to provide final policy – Due Date: 26.06: 1/15/2026, 26.09: 12/31/2025 – In Progress
- DHCS to provide final forms and NOAs – Due Date: 26.06: 1/30/2026, 26.09: 2/27/2026 – In Progress
- Complete Design – Due Date: 26.06: 1/15/2026 – In Progress, 26.09: 4/23/2026
- Complete BenefitsCal Design – 26.06: 3/27/2026, 26.09: 5/29/2026
- Complete Integration Test: 26.06: 5/22/2026; 25.09: 8/28/2026

### CURRENT MITIGATION PLAN

- Complete System Test – Due Date: 26.06: 5/29/2026, 26.09: 9/4/2026
- Complete BenefitsCal System Test: 26.06: 6/19/2026; 26.09: 9/11/2026 Distribute enhanced project communications - Ongoing

## M&O

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

DESCRIPTION	OWNERS
<p>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.</p>	Michele Peterson, Rachel Hernandez, Jerald Nielson, Ayana Alvarez, Ramya Raghunathan

PRIORITY	DATE IDENTIFIED	RESOLUTION DUE DATE	ESCALATION DATE
HIGH	8/12/2025	1/31/2026	8/13/2025

LATEST STATUS NOTES
<ul style="list-style-type: none"><li>■ 1/12/2025: CARES provided an ETA of 1/16/2026 to wrap up the vendor extract analysis based on their discussions with LA and start the joint solutioning sessions. Currently, CARES indicated they can generate the extract in the same DCFS file format to CalSAWS.</li><li>■ 12/15/2025: CARES team is continuing with the feasibility evaluation of generating the LA vendor extract to CalSAWS. Pending CARES confirmation.</li><li>■ 11/17/2025: CARES is currently evaluating the option of sending a vendor extract file to CalSAWS or directly to LA. On 10/20/2025, CalSAWS provided the vendor file format currently used by LA. CARES will provide an update following their meeting with LA on 11/17/2025.</li></ul>

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.
<b>Timeline:</b>

### CURRENT ISSUE RESOLUTION PLAN

- Aug 2025 - confirmed CARES decision that Vendor API would be developed as a post V1 deployment.
- Sept - Oct 2025 - CalSAWS to complete analysis and identify different designs and possibly different county business practices to support vendor management and automation

## M&O

### ISSUE 323- INTEGRATED PERFORMANCE TESTING WITH CARES HAS UNCLEAR EXECUTION TIMELINE AND APPROACH

DESCRIPTION	OWNERS
<p>Integrated performance testing with CARES has a plan to utilize the existing PERF environment to execute performance and stress testing. The PERF environment is heavily used throughout each week for performance testing of new changes going into production. The scheduling of tests is very tightly controlled and requires at least 2 months of notice to effectively slot in new tests. The integrated test with CARES was targeted to begin on December 1, 2025. The specific environment, test plan, set up, and agreed upon data being used are still unconfirmed, which prevents proper planning of the test in CalSAWS. Additionally, the CARES performance environment has been loaded with unmasked production data from CWS/CMS, which does not align with the current I-MOU between CalSAWS and CARES.</p>	Michele Petersen, Rachel Hernandez, Jerald Nielson, Ramya Raghunathan

PRIORITY	DATE IDENTIFIED	RESOLUTION DUE DATE	ESCALATION DATE
HIGH	10/22/2025	12/31/2025	10/22/2025

LATEST STATUS NOTES
<ul style="list-style-type: none"><li>■ 1/12/2026: CARES confirmed the integrated PERF test with CalSAWS will start in April 2026. Awaiting final execution timelines. CalSAWS will continue preparation and conduct isolated API baseline testing to resolve any CalSAWS issues ahead of joint execution.</li><li>■ 12/15/2025: CARES indicated (on 12/09) that the start of PERF test execution may shift to begin in April instead of the previously noted 01/19 date to commence PERF testing after QA testing is complete, and to focus on EUST3. CalSAWS recommended a test earlier in the year to establish baselines and run a cycle again in April, as needed. CARES is currently evaluating the proposal and to provide a final confirmation on their ability to test earlier in the year. Note: If CARES decides to move forward with PERF testing as previously planned, the target begin date 1/19/26 could shift right by a few days, given the delay in receiving infra connectivity credentials from CARES.</li><li>■ 11/17/2025 - On 11/6/25, CARES confirmed that CARES 200 will be used as the environment for CalSAWS integrated testing. This environment does not contain production data. CARES is able to fabricate the necessary transaction volume for API testing. Additionally, CARES will independently conduct production volume testing in the CARES 100 environment. CARES is currently finalizing the PERF execution timelines. Note: There is a potential for CARES API response times to differ from actual production performance due to the use of fabricated data sourced from a low-volume database. CalSAWS recommends utilizing production-sized volumes of masked data for integrated testing with CalSAWS. This is noted as a watch item for the time being.</li></ul>

## CURRENT ISSUE RESOLUTION PLAN

Work with the CARES project to determine the next course of action to get a database with a masked production copy or fabricated production volume that can be linked to the CalSAWS PERF environment. Once linked, both projects will need to participate in data setup activities to prepare for performance testing the API and pages related to the FCED interface. CalSAWS has requested at least 8 weeks of lead time for the targeted date, plan, and data use agreements to be in place to allow for enough preparation time.