

CalSAWS



CalSAWS Risk Management Group RMG Report – Off Cycle

February 25, 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 318 - CARES conversion approach may require 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 326 - Lack of timely policy guidance may impact Medi-Cal HR1 delivery schedule

Risk 327 - Limited Availability of Deloitte Staff May Impact the BenefitsCal Transition Schedule

Risk 328 - Lack of Availability of Deloitte Offshore Resources May Impact Transition of Development KT/JS Activities

Risk 329 - Delay in Providing Accenture Team Timely Access May Impact BenefitsCal Transition Activities

Risk 330 - Current BenefitsCal System Performance May Not Meet The New SLA Performance Standards Set In The New Contract

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

GENERAL ANALYSIS

The overall average Project risk exposure level, due to nine open risks and two open issues, is now at 1.78.

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 seven 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 eight risks having trigger dates occurring within the next 90 days (Near Horizon).

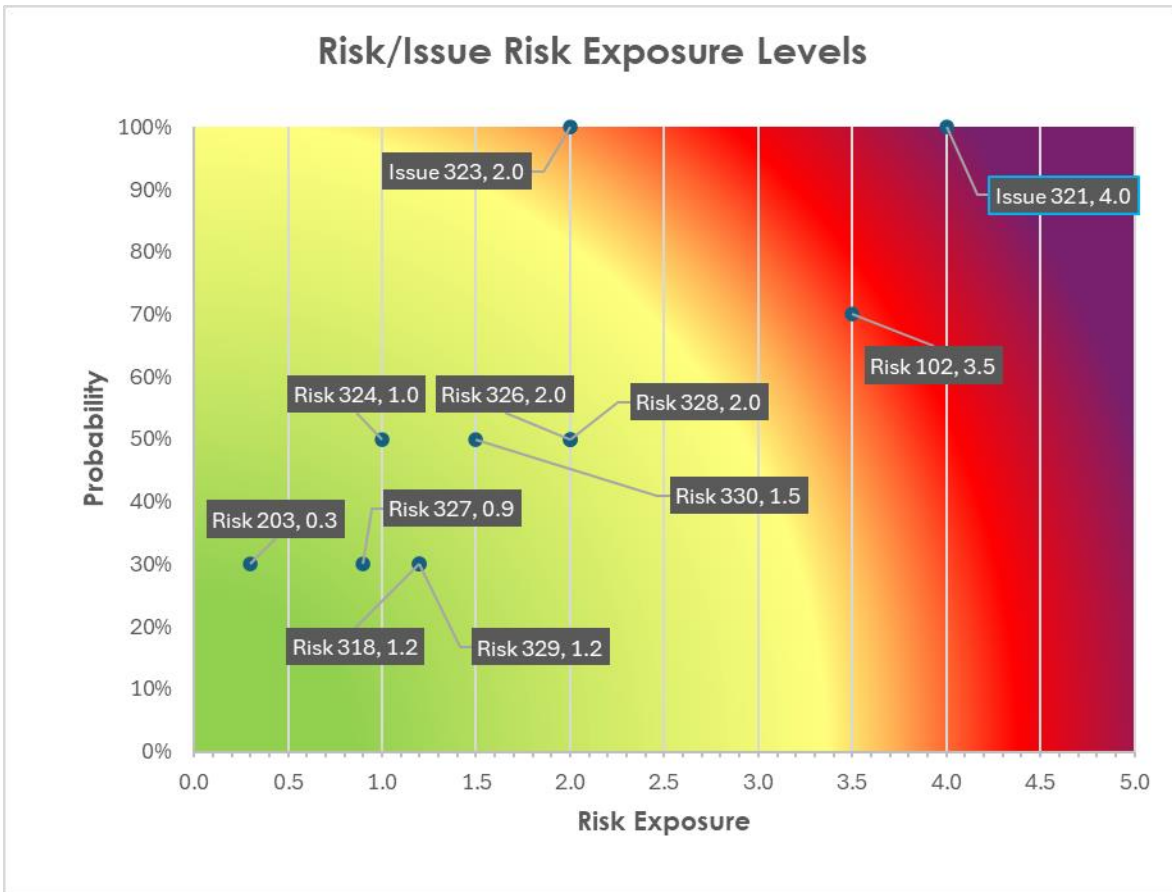


Figure 1 Risk and Corresponding Risk Exposure

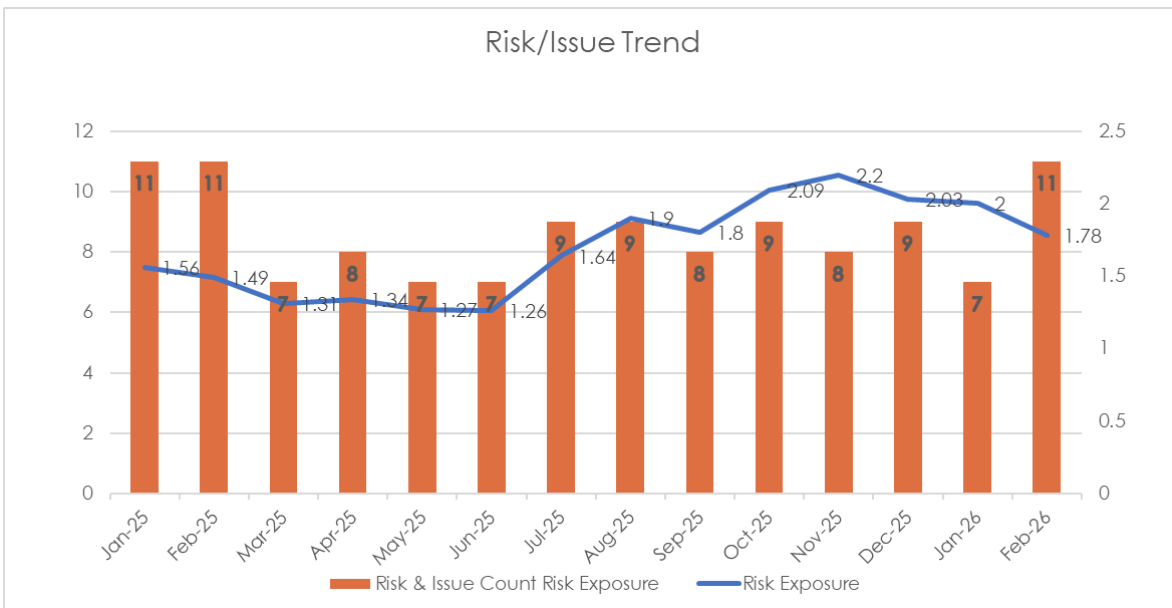


Figure 2 Overall Risk Level and Numerical Analysis

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

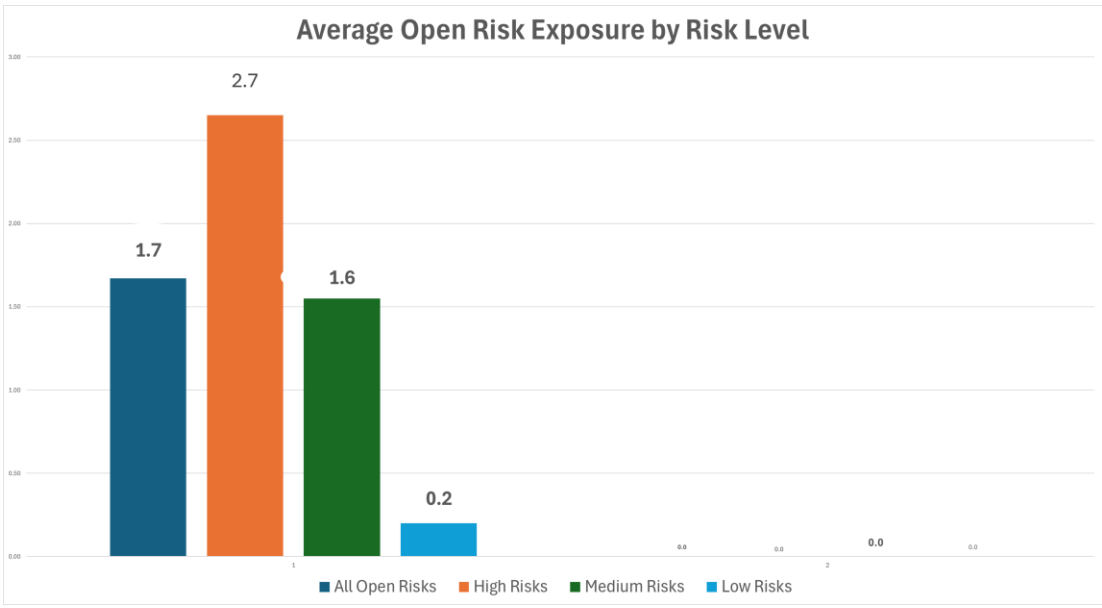


Figure 4 Avg of Open Risk Exposures within Risk Level Category

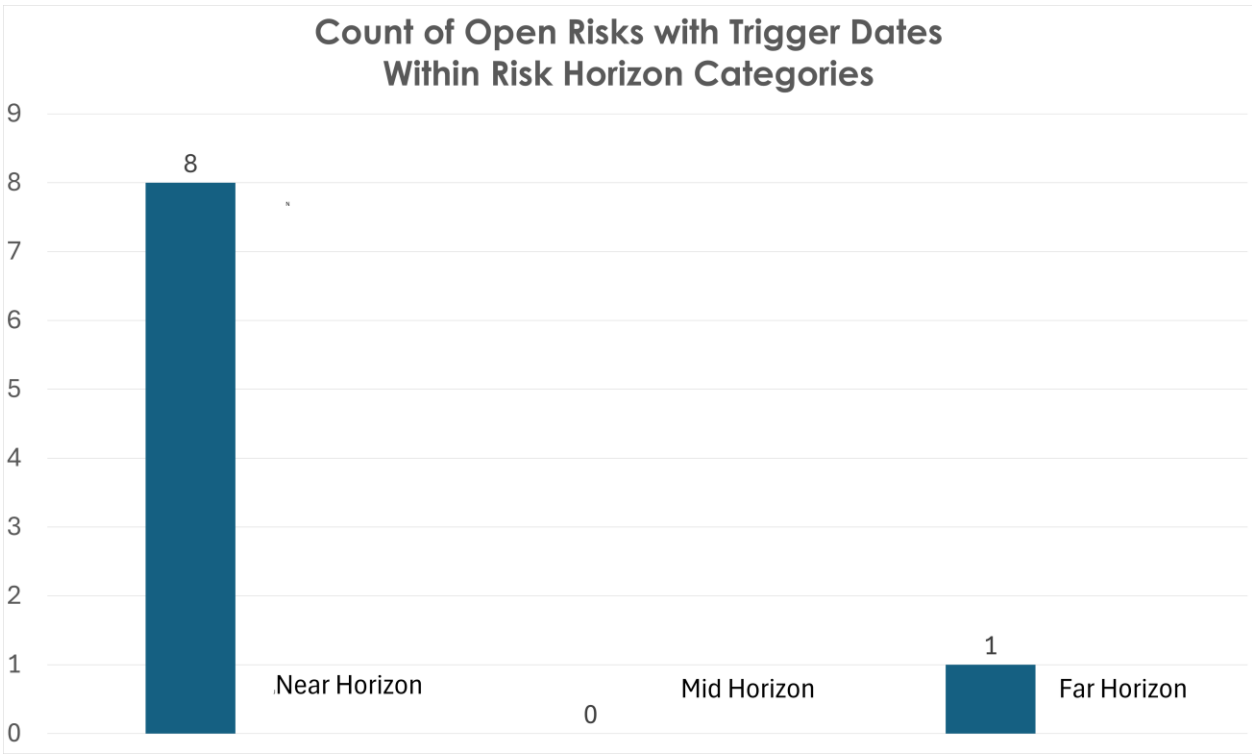


Figure 5 Count of Open Risks with Trigger Dates Within Risk Horizon Categories

CALSAWS MAINTENANCE AND OPERATIONS

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

- Feb 9, 2026: CPMO is working with OTSI on spring budget updates.

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.

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.	Holly Murphy, Peggy Macias

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
Low	Remains same 	1/31/2026	2/28/2026

LATEST STATUS NOTES

- Feb 9, 2026: User testing completed, pilot underway.
- Jan 12, 2026: Content development continues, plans for pilot/test are underway to take place end of January.
- 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.

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 - Completed)
- Design and develop new web portal (Gainwell Tools Team/CPMO/Customer Engagement, target December 31, 2025)
- Develop standards and maintenance processes to support integrity of the web portal – (CPMO/Customer Engagement, target January 31 2026)
- 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 MAINTENANCE AND OPERATIONS

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, Ramya Raghunathan, Jerald Nielson

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Upward 	3/2/2026	4/1/2026

LATEST STATUS NOTES

- 2/9/2026: January extract match rates: AAP 97%; KG 87% Match rate is consistent with December match rates.
- Next step: CARES team to provide a recommendation handling of the the residual unmatched cases (available in CalSAWS but not in CARES) by 2/28/2026. Collaboratively define county actions for fall out cases for FC, KG, AAP.
- 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).


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 PRODUCTION 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 has 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>	<p>Michele Petersen, Rachel Hernandez, Jerald Nielson, Ramya Raghunathan</p>

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
<p>MEDIUM</p>	<p>Upward </p>	<p>3/1/2026</p>	<p>3/15/2026</p>

LATEST STATUS NOTES

- 2/9/2026: Per CWDA directive, pilot and process simulation activities have been replaced with Production Simulation activities that will occur between May 2026 – October 2026. The risk will remain open until several activities and key milestones are established, such as:
 - Entry and Exit criteria
 - Environment and Readiness Timeline
 - Defect tracking and hand off
 - Case Link testing strategy and data refreshes
 - County Communication Processes;
- On 2/4/2026, CARES confirmed verbally, the funding will be available this FY. OTSI team to send an official email with this update.

LATEST STATUS NOTES

- 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.
- 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 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 resume , coordinate with CARES to determine how masked production data can be used for Process Simulation in CalSAWS.

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>	<p>Pragati Sharma , Jerald Nielson, Michele Peterson, Emmeil Davis</p>

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

LATEST STATUS NOTES

- 2/9/2026 - 26.06: Final policy extended to 2/28/2026 and Final forms and NOAs extended to 3/3/2026 to support threshold language NOAs from DHCS
- 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: 2/28/2026 - In Progress
 - 26.09: 12/31/2025 – Completed
- DHCS to provide final forms and NOAs – Due Date:


CURRENT MITIGATION PLAN

- 26.06: 3/3/2026 - In Progress
- 26.09: 2/27/2026 – In Progress
- Complete CalSAWS Design – Due Date:
 - 26.06: 1/15/2026 – Completed
 - 26.09: 4/23/2026 - In Progress
- 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
- 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

CALSAWS TRANSITION RISK

RISK 327 - LIMITED AVAILABILITY OF DELOITTE STAFF MAY IMPACT THE BENEFITSCAL TRANSITION SCHEDULE

DESCRIPTION	OWNERS
Limited availability of Deloitte Knowledge Transfer (KT) providers to support the timely transition of BenefitsCal to Accenture while also supporting ongoing M&E Releases, Premise and other ongoing efforts. The impact would be during KT (February-April) and Reverse Shadow (RS) (March-July).	Lulu Fou, Jim Yemm, Yong Vangbliayang, Onur Senman, Pandu Gupta, Liji Joseph

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Remains same 	2/13/2026	4/2/2026

LATEST STATUS NOTES

- 2/9/2026 - Introduced new risk


CURRENT MITIGATION PLAN

Fulfill the document request list (provided on 1/26/2026) as soon as possible in order for Accenture to develop the KT plan. The KT plan will lay out the KT session requests in order for Deloitte to assign participants to the KT sessions. There is a dependency on the document requests/actions list in order to develop the KT plan. Accenture will be providing the Knowledge Transfer (KT) Plan for Deloitte to review and schedule participants availability. This collaborative KT scheduling approach will allow Deloitte staff to balance both BenefitsCal commitments and support the BenefitsCal Transition.

CALSAWS TRANSITION RISK

RISK 328 - LACK OF AVAILABILITY OF DELOITTE OFFSHORE RESOURCES MAY IMPACT TRANSITION OF DEVELOPMENT KT/JS ACTIVITIES

DESCRIPTION	OWNERS
Deloitte to provide offshore resources to participate in Knowledge Transfer (KT) session for offshore development work upon Accenture providing the KT Plan. Accenture to hold a session with KT recipients to establish when to do KT with the Deloitte offshore team.	Lulu Fou, Jim Yemm, Yong Vangbliayang, Onur Senman, Pandu Gupta, Liji Joseph

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Remains same 	2/23/2026	4/2/2026

LATEST STATUS NOTES

- 2/9/2026 - Introduced new risk


CURRENT MITIGATION PLAN

Deloitte to provide offshore resources to participate in Knowledge Transfer (KT) session for offshore development work upon Accenture providing the KT Plan. Accenture shared the initial KT plan with Deloitte. The initial target per Deloitte is to provide offshore KT before 10:30 a.m. Monday - Friday, to be confirmed once scheduling confirmed.

CALSAWS TRANSITION RISK

RISK 329 - DELAY IN PROVIDING ACCENTURE TEAM TIMELY ACCESS MAY IMPACT BENEFITS CAL TRANSITION ACTIVITIES

DESCRIPTION	OWNERS
Accenture staff may be unable to conduct KT sessions if access to documentation, code/Bitbucket (read only), etc. is not provided timely. Accenture staff may be unable to perform certain Job Shadow/Reverse Shadowing activities timely without access to BenefitsCal environment and tools (e.g., Bitbucket, software licenses, etc.).	Lulu Fou, Jim Yemm, Yong Vangbliayang, Onur Senman, Pandu Gupta, Liji Joseph

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Remains same 	2/16/2026	2/23/2026

LATEST STATUS NOTES

- 2/9/2026 - Introduced new risk


CURRENT MITIGATION PLAN

Plan is to have Consortium and Deloitte provide document request list (provided on 1/26/2026), resolve access, tools, and environment challenges for both on-shore and offshore team members prior to the knowledge transfer sessions starting. Access includes SharePoint, Environment, AWS Workspaces, ForgeRock, and ServiceNow.

CALSAWS MAINTENANCE AND OPERATIONS

RISK 330 - CURRENT BENEFITSCAL SYSTEM PERFORMANCE MAY NOT MEET THE NEW SLA PERFORMANCE STANDARDS SET IN THE NEW CONTRACT

DESCRIPTION	OWNERS
Current BenefitsCal System performance may not meet the new Service Level Agreement (SLA) performance standards set in the new contract.	Dana Peterson, Jason Horton, Robert Lusk, Jerald Nielson, Rahul Upadhyay, Pandu Gupta

LEVEL	TRENDING	EARLY IMPACT DATE	TRIGGER DATE
MEDIUM	Remains same 	3/27/2026	4/10/2026

LATEST STATUS NOTES

- 2/9/2026 - Introduced new risk

CURRENT MITIGATION PLAN

Conduct a comprehensive assessment of current system performance against new SLA requirements. If gaps are identified, develop and implement targeted remediation actions such as infrastructure upgrades, code optimization, or query tuning to ensure compliance with SLA standards.

M&O

ISSUE 321 - CARES LA VENDOR EXTRACT INTERIM FILE TO CALSAWS UNTIL VENDOR API IS DEVELOPED 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>	<p>Michele Peterson, Rachel Hernandez, Jerald Nielson, Ramya Raghunathan</p>

PRIORITY	DATE IDENTIFIED	RESOLUTION DUE DATE	ESCALATION DATE
HIGH	8/12/2025	2/20/2026	8/13/2025

LATEST STATUS NOTES

- 2/9/2026:
 - Risk 321 has been updated to focus on Los Angeles, and a new risk will be created for the long-term Vendor API applicable to all counties.
 - CARES feasibility analysis for LA extract generation is complete.
 - CARES has confirmed feasibility of LA extract generation to CalSAWS.
 - CARES and CalSAWS will begin design discussions the week of 2/09/2026.
 - CARES is working with CDI to provide an implementation timeline.
- 1/12/2016: 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.
- 12/15/2025: CARES team is continuing with the feasibility evaluation of generating the LA vendor extract to CalSAWS. Pending CARES confirmation.

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.

Timeline:

- 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

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>	<p>Michele Petersen, Rachel Hernandez, Jerald Nielson, Ramya Raghunathan</p>

PRIORITY	DATE IDENTIFIED	RESOLUTION DUE DATE	ESCALATION DATE
HIGH	10/22/2025	02/20/2026	10/22/2025

LATEST STATUS NOTES
<ul style="list-style-type: none"> ■ 2/9/2026: PERF test execution timeline received from CARES. Execution window: 3/23–4/26. <ul style="list-style-type: none"> • Environment connectivity established between CARES 200 and CalSAWS PERF. • CARES and CalSAWS are conducting isolated testing and joint scripting in preparation for integrated testing. • Recommendation: transition the issue to a risk and monitor through execution. • Continue to work both performance teams finalize and define metric threshold criteria ■ 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. ■ 2/15/2025: 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.

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.