

# *Minnesota Health Insurance Exchange (MNHIX)*

1.1.2 Project Charter

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## 1. MNHIX Introduction

Under the Federal Patient Protection and Affordable Care Act (ACA) enacted in March of 2010 (Public Law 111-148 and 111-152), new mechanisms for comparing and obtaining health care coverage were created called Health Benefit Exchanges. An Exchange must be operational in each State by January 1, 2014. By January 1, 2013, a State must have taken the necessary steps to have an Exchange operational by January 1, 2014 or the U.S. Department of Health and Human Services (HHS) will establish one on a State's behalf.

An Exchange is an organized competitive marketplace to facilitate the comparison, choice, and purchase of health care coverage for individuals and employees of small businesses. Through an Exchange, individuals and employees will have access to comparable information on costs, benefits, health care providers, quality, and customer satisfaction for an array of coverage options, and they can use this information to choose and enroll in the health benefit plan that best fits their personal and family needs. Exchanges will also assist eligible individuals and small businesses in receiving premium tax credits and cost-sharing reductions or help individuals enroll in Federal or State health care programs. By engaging consumers in a one-stop shopping experience with transparent information, Exchanges will make purchasing health insurance easier and more understandable, put more control and choice in the hands of individuals and employees of small businesses, and incent greater market competition.

An Exchange will carry out a number of functions that include:

- Ensuring that health insurers and health benefit plans meet certain standards for Exchange participation.
- Providing comparative information on costs, benefits, health care providers, quality, and customer satisfaction using a standard format.
- Determining individual, employer, and employee eligibility for Exchange participation, exemptions from individual coverage responsibilities, premium tax credits and cost-sharing reductions, Federal and State health care programs, and potentially other social service programs.
- Facilitating "real-time" eligibility determination and enrollment using a uniform format.
- Sharing information with Federal and State agencies regarding eligibility, administration of tax credits and cost-sharing reductions, exemptions from individual coverage responsibilities, etc.
- Communicating with employers regarding employee eligibility, coverage choices and defined contribution, coverage initiation and cancelation, potential employer coverage requirement liability, etc.
- Establishing a call center and website.
- Operating a "Navigator" program to provide outreach, education, and assistance to individuals and employers. Navigators may be brokers/agents, community-based organizations, or other types of individuals/organizations capable of meeting yet to be determined requirements to be certified as a Navigator.

### 1.1 MNHIX Scope

The State of Minnesota Department of Commerce awarded MAXIMUS a contract to develop a fully functioning Health Benefit Exchange (“the Exchange”). The priority of the MNHIX project is to implement a Health Benefit Exchange that is compliant with the MAGI eligibility rules, as well as an Exchange that creates an organized competitive marketplace to facilitate the comparison, choice, and purchase of health care coverage for individuals and employees of small businesses. Through an Exchange, individuals and employees will have access to comparable information on costs, benefits, health care providers, quality, and customer satisfaction for an array of coverage options, and they can use this information to choose and enroll in the health benefit plan that best fits their personal and family needs. Exchanges will also assist eligible individuals and small businesses to receive premium tax credits and cost-sharing reductions or help individuals enroll in Federal or State health care programs.

By engaging Minnesotans in a one-stop shopping experience with transparent information, the Exchange will make purchasing health insurance easier and more understandable. It will put more control and choice in the hands of individuals and employees of small businesses, and will foster greater market competition. The State’s vision of MNHIX was discussed in a series of Visioning Session conducted by MAXIMUS. During those sessions, the participants which came from all the State stakeholder agencies developed the following vision statement:

**“Minnesotans creating the go-to place for affordable health coverage”**

The MAXIMUS Project Team will lead the activities at MNHIX during the implementation of the Exchange. MAXIMUS is responsible for various implementation activities including:

- *Project Management (PM):* Communicating project status and issues, developing implementation plans and schedules, providing expertise to support implementation activities, and managing project level risks.
- *Implementation:* Acquiring, installing, designing, developing, deploying, and testing the Exchange, and the planning and execution of system and integration testing
- *Training:* Training preparation and execution, developing training materials, supporting the adaptation of learning materials, and conducting training sessions.

The MNIX project will include implementation of elements of the following modules from IBM/Curam and Connecture. The specific functionality and configuration of the modules will be further defined during the business architecture sessions and during each of the 6 sprints.

Module	Vendor	Software
Individual Eligibility and Exemption	IBM/Curam	<ul style="list-style-type: none"> <li>• IBM Cúram Enterprise Framework</li> <li>• IBM Cúram Evidence Broker</li> <li>• IBM Cúram Financial Management</li> <li>• IBM Cúram Global Medical Assistance</li> <li>• IBM Cúram Funded Program Management</li> <li>• IBM Cúram Intelligent Evidence Gatherin</li> <li>• IBM Cúram Verification</li> <li>• IBM Cúram Business Intelligence and Analytics</li> <li>• IBM Cúram Citizen Portal</li> <li>• IBM Cúram Health Care Bundle</li> </ul>

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Module	Vendor	Software
Individual Enrollment	Connecture	<ul style="list-style-type: none"> <li>Connecture StateAdvantage</li> <li>Individual/AHBE: Shopping;</li> <li>Individual/AHBE: Initial Enrollment;</li> <li>Individual/AHBE: Renewals/Re-enrollment.</li> </ul>
Small Employer Eligibility and Enrollment	Connecture	<ul style="list-style-type: none"> <li>SHOP-Shopping (Employer and Employee)</li> <li>SHOP-Enrollment (Employer and Employee)</li> <li>SHOP-Employer Maintenance</li> <li>SHOP-Employee Maintenance</li> <li>SHOP-Employer Renewal.</li> </ul>
Health Benefit Plan and Navigator-Broker Certification and Display	Connecture	<ul style="list-style-type: none"> <li>Health Plan Management (Plan and Rate Maintenance)</li> </ul>
Provider Display	Connecture	<ul style="list-style-type: none"> <li>Provider Facilities/Directory and Search</li> </ul>
Fund Aggregation	EngagePoint	<ul style="list-style-type: none"> <li>Bill Generation</li> <li>Bill Aggregation</li> <li>Bill Presentment</li> <li>Payment Processing</li> <li>Reconciliation</li> <li>Payment Disbursement</li> <li>Exception Handling</li> <li>Notifications</li> </ul>
Account Administration	EngagePoint	ezAudit ezNotification Master Data Services

Table 1 – MNHIX COTS Modules

## 1.2 Critical Success Factors

The following are the Critical Success Factors for the Exchange were developed during the Visioning Sessions. These factors may influence decisions made about the Exchange during System implementation. As part of the MNHIX effort, the project management team will review these factors on a regular basis (during weekly status meeting) to ensure that they are being positively attended to.

- The project is delivered on time
- Each type of Exchange user should have the same user experience
- 80% users should be able to complete activities within the system without assistance
- The system should be easy of use
- The system should be robust and trustworthy
- The system should result in more customers being insured
- The system must accurately determine eligibility
- The system must assist in problem resolution

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- There can be no breach of data or the system
- The system must met the user’s needs
- The system must help customers maintain coverage through transition
- The system must support Individuals
- Contingencies (workarounds) must not be at the consumers expense
- Roles must be clear
- The system must support staff needs

### 1.3 Guiding Principles

During the Visioning Sessions, a consensus set of guiding principles was developed for the MNHIX Technology Solution Design based on MN’s business drivers. These guiding principles will be referred to during the development of business requirement and design of the Exchange.

Category	MNHIX Project Guiding Principles
<b>Access and Opportunity</b>	The Portal should provide intuitive pathways for all users.
	All users can access and exit securely and save their progress
<b>Economic</b>	The Portal should have limited presentation views – grouped by user types to avoid over engineering
	Maximize the ability for users to self-serve without assistance.
	Present automated solutions wherever feasible to avoid manual steps for users
	Analyze the cost-benefit of customization versus process change.
	If COTS can deliver functionality – do not customize – change process if necessary.
<b>Decision Making</b>	The majority of decisions during development/implementation will be made by State representatives of work groups, empowered to do so.
	All members will strive for consensus in decision making – but where significant disagreement is present, the meeting facilitator will record and present the issue for escalation or ‘parking lot’. Those parking lot items will be decided upon within 24 hours of escalation.
	Decisions need to focus on the best outcome; not be based on current practice.
<b>Design Principles</b>	COTS design will be used wherever possible; rarely allow customization
	Task Force products will be referred to for guidance – and implemented where they can be reasonably accommodated by COTS.
	The Portal design must be client-focused – not program-focused.
	Help features need to be present at logical points to allow for smooth navigation
	Screens need to be simple, easy to understand and navigable.
	Where future requirements and processes (i.e. Modernization) can be accommodated within planned design and architecture reasonably, the teams should strive to do so.
<b>Stakeholder Engagement</b>	State personnel will liaise with Stakeholders, and will include as appropriate
	Early planning with detailed agendas is critical to allow for stakeholder inclusion as appropriate.
<b>Communications</b>	Design for pro-active communications with clients to assist them and avoid unnecessarily breaks in service or cause for concern/inquiry
	Use terminology familiar to customers.
	Exchange Team will agree on full vocabulary for the Exchange – to be used internally.
	All screens, communications will be approved by the State

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Category	MNHIX Project Guiding Principles
<b>Processes/Implementation Schedule</b>	Priority of design, functionality on delivering to federal requirements – but with sufficient functionality to meet Minnesotans needs.
	Meet critical dates (e.g. certification date, User Acceptance, Open Enrollment).
	Plan/scheduling will include meeting objectives with sufficient detail to allow State to calendar appropriate attendees.
<b>Transparency/Accountability</b>	All deliverables will be available for public record
	Full disclosure can be expected of all Exchange related materials.
	The State will avail the public of the status of the Exchange construction throughout the project.

**Table 2 – Guiding Principles for the MNHIX Project**

## 2. Project Oversight and Organization

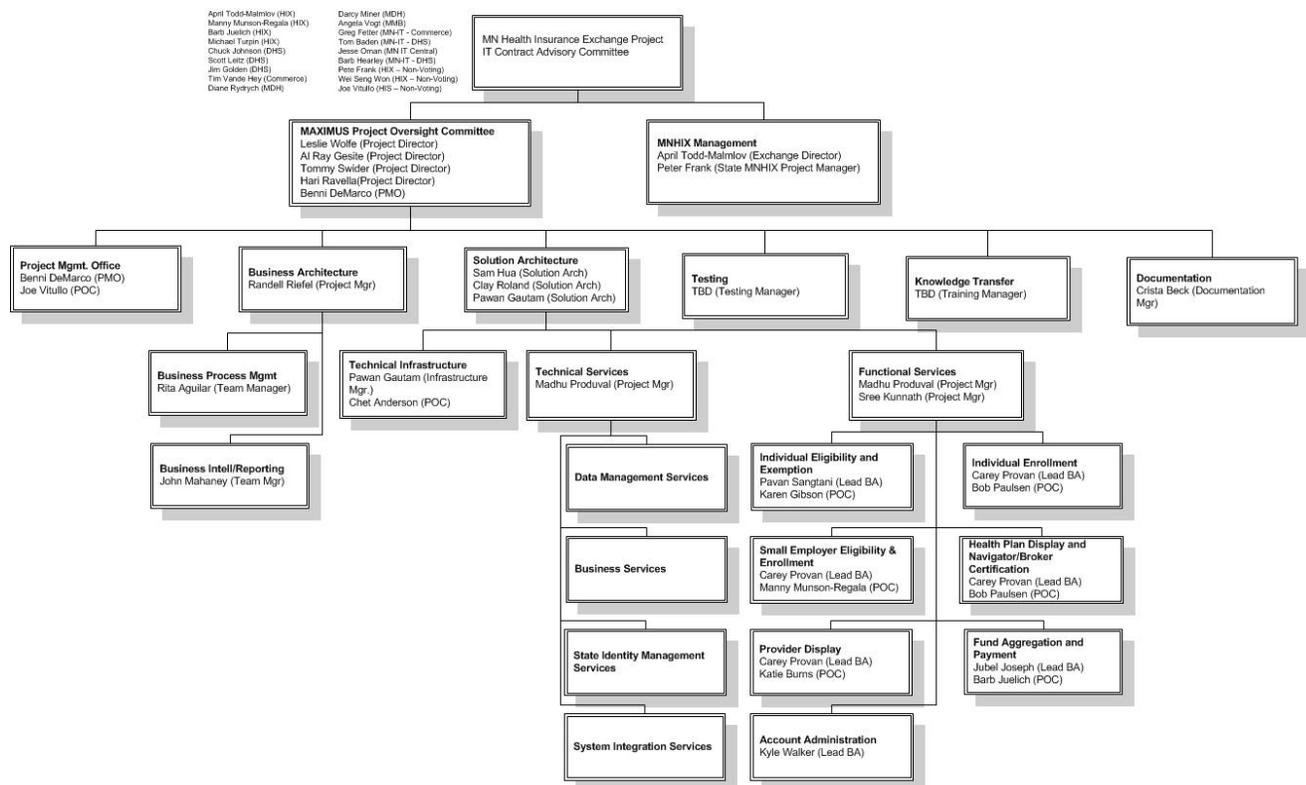


Figure 1 – Project Organization Chart

Figure 1 shows the Project Organization Chart at the end of Project Initiation activities.

### 2.1 IT Contract Advisory Committee

The IT Contract Advisory Committee will provide management support and project leadership. Specifics of the role include:

- Review project status and evaluate project risk on ongoing basis
- Provide guidance and feedback to the Project Team
- Resolve issues in a timely manner per the project issue escalation policy
- Actively champion the project
- Communicate project specifics within respective agencies
- Actively participate in Steering Committee meetings
- Approve changes to project scope, timing, budget, and charter, as appropriate
- Remove obstacles to project success

### 2.2 Project Oversight Committee

The Project Oversight Committee will provide overall guidance to the project and provide senior-management direction as needed. Specifics of the role include:

PROJECT CHARTER

- Actively champion the project and monitor project progress
- Maintain thorough understanding of the project
- Provide senior-level support and guidance to the IT Contract Advisory Committee and Project Team
- Assist in removing obstacles to success
- Empower the project team to make decisions
- Make strategic-level decisions and resolve issues in a timely manner per the project issue escalation policy

## 2.3 Project Teams

The MNHIX Project Team will provide the day-to-day operation of the project and will:

- Serve as full-time participants on the project
- Participate/lead specific project tasks in accordance with the project plan
- Facilitate work sessions and conduct interviews, as appropriate
- Ensure adequate project documentation is created and maintained
- Perform development of assigned deliverables, and ensure deliverables are completed on schedule
- Actively participate in developing project work products, refining business processes, and in developing, implementing and testing system requirements
- Anticipate problems proactively and make recommendations for improvements
- Resolve issues in a timely manner per the project issue escalation policy
- Actively participate in Project Team meetings and status reporting activities
- Review project deliverables in accordance with deliverable review process

### 3. Project Work Breakdown Structure (WBS)

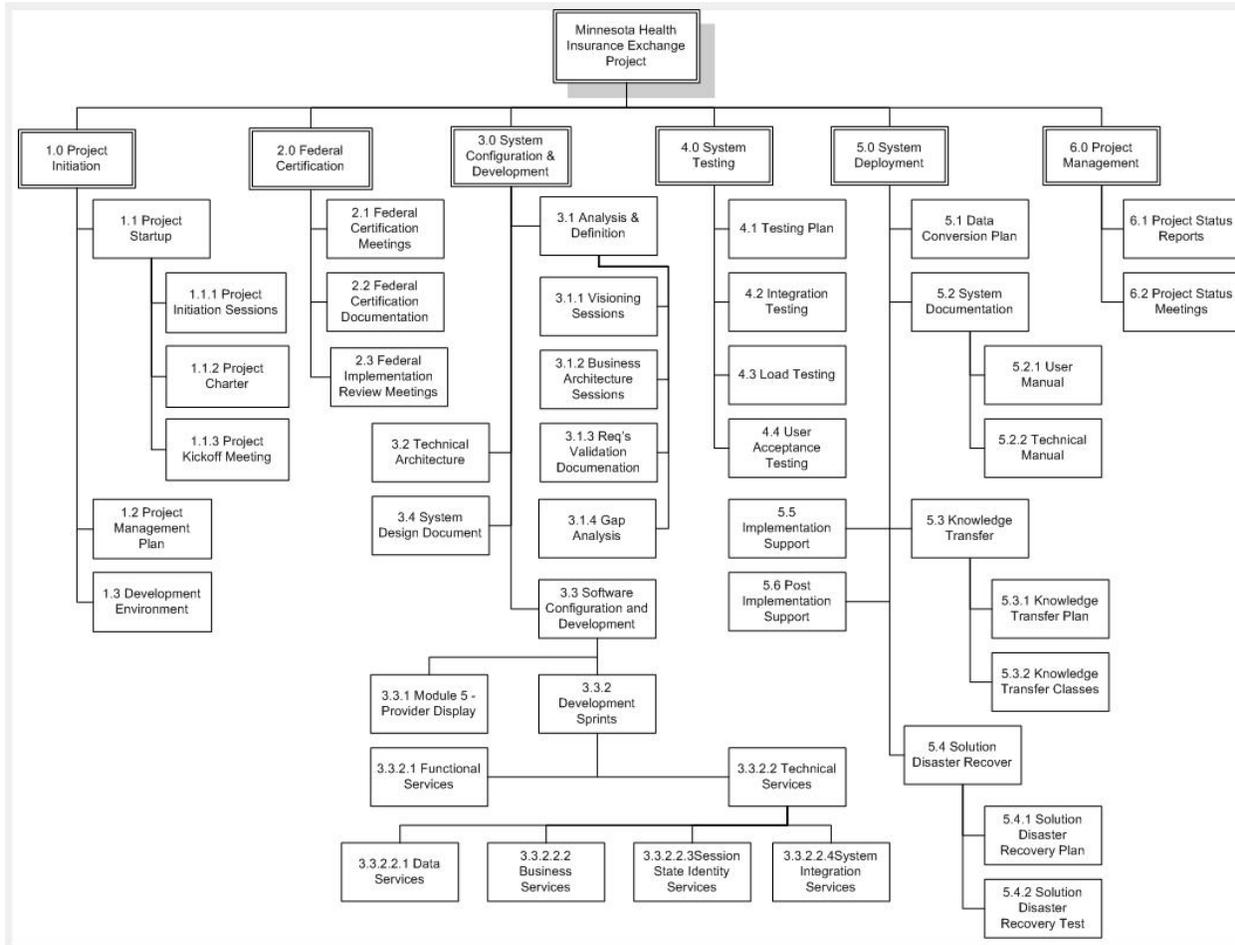


Figure 2 – Project Work Breakdown Structure

The Project Work Breakdown Structure (WBS) subdivides project work into smaller, more manageable components. The WBS is a “deliverable-oriented hierarchical decomposition of the work to be executed” in order to meet requirements and complete project work. The WBS and the WBS Dictionary are the scope baseline for the project. This scope baseline is monitored, verified and controlled throughout the life of the project. The WBS is shown in Figure 2. A definition for each item in the WBS is explained in the WBS Dictionary in Table 3.

#### 3.1 WBS Dictionary

WBS Dictionary		
ID	Component Name	Description
1.0	Project Initiation	Project Initiation is a work package that includes activities that are undertaken to start the project and are necessary for the project to move forward.
1.1	Project Start Up	Project Start Up is a work package that includes activities undertaken very early in the project to make important managerial decisions and orient stakeholders.

## PROJECT CHARTER

WBS Dictionary		
ID	Component Name	Description
1.1.1	Project Initiation Sessions	Project Initiation Sessions are a series of meetings in which project managers discuss and finalize project scope, schedule and management processes and procedures.
1.1.2	Project Charter	The Project Charter is an informative and educational tool for project and client staff, and provides a baseline against which future project developments can be measured.
1.1.3	Project Kickoff Meeting	The Project Kickoff Meeting is a meeting with project stakeholders to review the project scope and other important project information.
1.2	Project Management Plan	The Project Management Plan is a written deliverable that defines the management processes that will be used to govern the project. It also includes the baseline Project Schedule created from the proposed Project Schedule and/or modifications based on management review during Project Initiation.
1.3	Development Environment	The Development Environment is a series of activities required to assist in the implement the physical hardware and networking environment, and install the required software on the hardware in order to begin System Configuration activities.
2.0	Federal Certification	Federal Certification is a work package that includes activities related to participating in meetings with State and Federal agencies and producing document required for certification of the system by the federal governing agencies.
2.1	Federal Certification Meetings	Federal Certification Meetings are events attended by project staff, State and Federal agencies, which are necessary in order to certify and review the implementation of the system.
2.2	Federal Certification Documentation	Federal Certification Documentation is written materials required by Federal governing agencies required in order to certify the system according to Federal regulations.
2.3	Federal Implementation Review Meetings	Federal Implementation Review Meetings are events attended by project staff, State and Federal agencies, which are necessary in order to review the system prior to implementation.
3.0	System Configuration & Development	System Configuration & Development is a work package that includes all software analysis, design, development, and configuration activities on the project.
3.1	Analysis & Definition	Analysis & Definition is a work package that includes activities related to project visioning, validating requirements, designing business processes, reviewing system capabilities, and determining and documenting the software modifications that are necessary to meet the requirements and integrate the software products.
3.1.1	Visioning Sessions	Sessions are a work events attended by State executives and managers in order to develop a vision for the exchange and the project.
3.1.2	Business Architecture Sessions	Business Architecture Sessions is a work package that includes facilitated sessions attended by project staff and client stakeholders to discuss and clarify requirements and review and modify process models within the Exchange. In these meetings, participants will review and modify the Business Transaction Inventory (BTI), identify System Performers, review and modify the Business Process Models, and validate and/or modify business requirements and rules.

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WBS Dictionary		
ID	Component Name	Description
3.1.3	Requirements Validation Documentation	<p>Requirement Validation Documentation is a set of deliverable documents used by the project staff to validate and clarify requirements, trace requirements, define business rules, and design the business processes conducted through the system. It consists of the:</p> <ul style="list-style-type: none"> <li>• Business Transaction Inventory</li> <li>• Business Process Models</li> <li>• End-to-End Business Transaction Mappings</li> <li>• Requirements Traceability Matrix</li> <li>• Business Rules Documentation</li> <li>• Integrated Use Cases</li> </ul>
3.1.4	Gap Analysis	The Gap Analysis is the deliverable document that describes whether or not the requirements identified in the Business Architecture Sessions and the Requirements Validation Documentation can be satisfied by the standard functionality of solution software or whether the software will require modification in order to meet the requirements.
3.2	Technical Architecture	Technical Architecture is a set of activities to assist the State in planning and establishing the hardware and networking infrastructure for the system. In addition, these activities assist the state in determining the server software and solution support software.
3.3	Software Configuration and Development	Software Configuration and Development is a work package that includes all the tasks required to analyze, design, and construct the exchange software. This includes the configuration of the Commercial-Off-The-Shelf (COTS) software, modification of the COTS software, and the development and implementation of software required for system integration.
3.3.1	Module 5 – Provider Display	Module 5 – Provider Display is a work package specifically created for that part of the exchange solution. A special work package for this functionality is required because it has an early implementation date and cannot be addressed in the same timeframe as the other project configuration and development activities.
3.3.2	Development Sprints	Development Sprints is a work package for configuring and modifying the COTS products and Technical Services within the solution.
3.3.2.1	Functional Services	Functional Services is a work package for configuring and modifying the COTS products. Functional Services are related to providing the business functionality of the Exchange.
3.3.2.2	Technical Services	Technical Service Development is a work package for developing the additional software required to provide necessary technical services, integrate the internal system components, as well as integrating the Exchange with external systems.
3.3.2.2.1	Data Services	Data Services is a work package that includes the work necessary to create data service components in support of system integration. This package includes the Master Data Management services.
3.3.2.2.2	Business Services	Business Services is a work package that includes the work necessary to create business service components in support of system integration.
3.3.2.2.3	Session State Identity Services	Session State Identity Services is a work package that includes the work necessary to create service components necessary for identity management and session state.

## PROJECT CHARTER

WBS Dictionary		
ID	Component Name	Description
3.3.2.2.4	System Integration Services	System Integration Services is a work package that includes the work necessary to create components that integrate the solution software with external systems.
4.0	System Testing	System Testing is a work package that includes Integration Testing, Load Testing and User Acceptance Testing conducted or supported by project staff.
4.1	Testing Plan	The Testing Plan describes the methodology and processes used to perform Integration Testing, Load Testing, and User Acceptance Testing. Integration Testing ensures that all system features, including modifications function according to the requirements. Load testing is testing related to system performance. User Acceptance Testing consists of conducting test cases defined by the State.
4.2	Integration Testing	Integration Testing is a work package that includes conducting the integration tests according to the Testing Plan, correcting any discovered defects, and documenting the results.
4.3	Load Testing	Load Testing is a work package that includes conducting load tests according to the Testing Plan, correcting any discovered defects, and documenting the test results.
4.4	User Acceptance Testing	User Acceptance Testing is a work package that includes conducting the user acceptance tests according to the Testing Plan, correcting any discovered defects, and documenting the test results.
5.0	System Deployment	System Deployment is a work package that includes activities that are necessary to implement the system, document the system, and train people to use the system. The activities are necessary to transition from a system implementation phase to a system operations phase.
5.1	Data Conversion Plan	The Data Conversion Plan describes the plan for converting data from existing State systems into the structures and formats necessary to load the data in to the Exchange.
5.2	System Documentation	System Documentation is a work package that includes the generation of both user documentation and technical documentation.
5.2.1	User Manual	The User Manual is the deliverable document that instructs system end users how to use the system.
5.2.2	Technical Manual	The Technical Manual is the deliverable document that instructs system administrators and technical users how to maintain and/or configure the system.
5.3	Knowledge Transfer	Knowledge Transfer is a work package that includes activities for teaching state personnel how to operate and maintain the system.
5.3.1	Knowledge Transfer Plan	The Knowledge Transfer Plan describes the methodology and processes used to train state staff to operate and maintain the system.
5.3.2	Knowledge Transfer Classes	Knowledge Transfer Classes are the classroom training classes conducted according to the Knowledge Transfer Plan.
5.4	Solution Disaster Recovery	Solution Disaster Recovery is a work package that includes activities to plan, document and test the Solution Disaster Recovery Plan.
5.4.1	Solution Disaster Recovery Plan	The Solution Disaster Recovery Plan describes the methodology and processes used to restore the system in the case of a catastrophic software failure which makes the system unusable.

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WBS Dictionary		
ID	Component Name	Description
5.4.2	Solution Disaster Recovery Test	The Solution Disaster Recovery Test a work package that includes conducting the solution disaster recovery test according to the Solution Disaster Recovery Test Plan, correcting any discovered defects, and documenting the results.
5.5	Implementation Support	Implementation support includes activities related to scheduling and monitoring implementation events, and report event status to the client.
5.6	Post Implementation Support	The Post Implementation Support work package includes activities that take place in 4 weeks after to Go Live date of 9/27/2013. The Contract defines the outputs during this period as "Implementation Status Reports".
6.0	Project Management	Project Management is a work package that includes project management activities.
6.1	Project Status Reports	Project Status Reports is the activities related to producing the weekly Project Status Report.
6.2	Project Status Meetings	Project Status Meetings is the activities related to preparing for and conducting the weekly Project Status Meeting.

Table 3 – WBS Dictionary

## 4. Project Timeline Summary

The timeline for the MNHIX Project is shown in Figure 3. The timeline runs from July 27, 2012, to September 27, 2013.

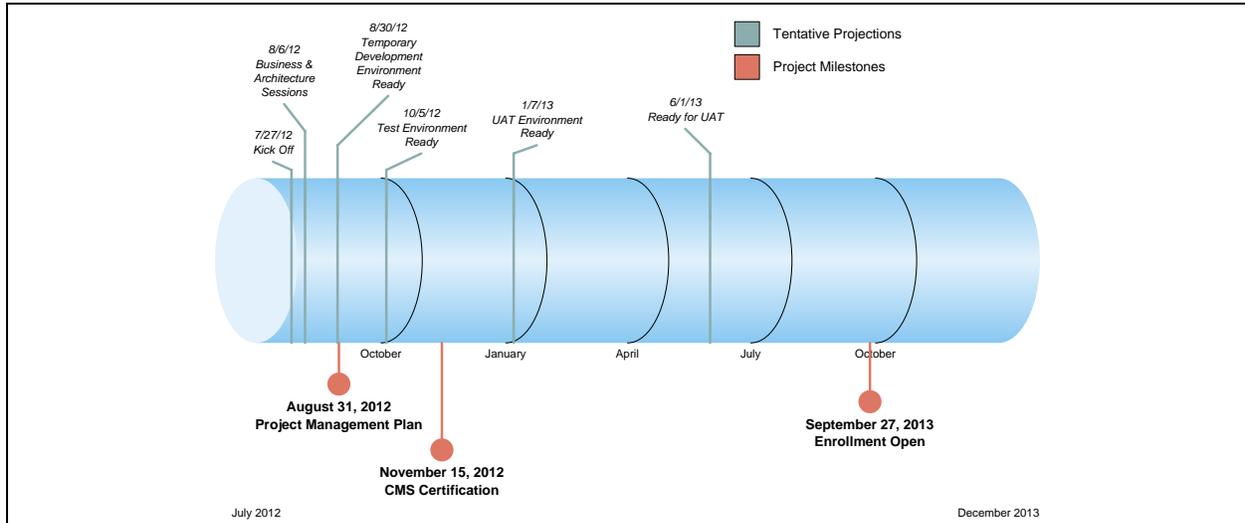


Figure 3 – High Level Project Timeline

### 4.1 Project Milestones and Deliverables Summary

Table 4 includes the Milestone and Deliverable dates from the baseline Project Schedule.

Milestone or Deliverable	Estimated Finish Date
Approve Final Project Management Plan	08/31/2012
Approve Requirements Validation Documentation Documentation	10/12/2012
Approve Gap Analysis Documentation	10/12/2012
Submit Final Federal Certification Documentation for Approval	11/15/2012
Module 5 - Provider Display Complete	11/16/2012
Approve System Design Document - High Level	12/13/2012
Approve Testing Plan	12/14/2012
Development Sprints Complete	03/29/2013
Approve System Design Document - Complete	04/12/2013
Technical Architecture Complete	04/13/2013
System Configuration Complete	04/29/2013
Deliver Integration Test Results Document	05/17/2013
Deliver Load Test Results Document	06/13/2012
Approve Technical Manual	06/27/2013
Approve Knowledge Transfer Plan	07/29/2013
Approve Solution Disaster Recovery Plan	08/09/2013
Approve User Manual	08/16/2013

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Milestone or Deliverable	Estimated Finish Date
System Testing Complete	09/06/2013
Go-Live	09/27/2013
Post Implementation Support Complete	10/25/2013

**Table 4 - Milestones and Deliverables**

## 5. Project Risks

Table 5 identifies the risks that were identified during the Project Initiation activities.

ID	Name (Root Cause)	Risk Description (Event)	Impact	Category	Prob	Impact	Score	Mitigation Strategy	Mitigation Due Date	Risk Owner	RRP Comp	Status	Tr d
1	Limited Requirements Defined	Incomplete requirements were identified in the RFP and Exhibits	<p>Greater possibility of gaps in functionality</p> <p>Greater possibility of missing State specific functionality</p> <p>Greater possibility of "Scope Creep"</p> <p>Greater possibility of delay in finalizing requirements</p> <p>Greater possibility of rework in subsequent phases</p>	Business Requirements	5	4	20	MAXIMUS is conducting the detailed BA sessions during each development sprint and documenting more detailed requirements through the Requirements Validation Documentation. State should provide timely closure on decisions regarding requirements and system scope.		Benni DeMarco	No	Identified	⇄
2	Multiple Rules Engine	Since there are various vendor products (IBM/Curam, Connecture) each with its own rules engines, it is not clear which rules engine takes precedence.	Potential duplication of rules or conflicting rules that lead to different outcomes.	Technology	3	4	12	EngagePoint will identify and describe the strategy using the rules engines.		Madhu Prodval	No	Identified	⇄
3	Technical Infrastructure Product Integration	Difficulty integrating to States end-to-end Infrastructure.	Potential difficulty integrating new technology into existing infrastructure.	Technology	4	4	16	Define the desired MN infrastructure requirements and develop MNHIX interface. Ensure MNHIX Operation Team are involved at every stage.			No	Identified	⇄
4	Communication between Multiple Vendors and Multiple State Agencies	Going through hierarchical reporting structure will impact real time decision making.	Potential bottlenecks in document reviews and decision making may affect task completion according to the Project Schedule.	Communications	5	4	20	Identifying a Point-of-Contact for each functional and technical area from MAXIMUS and state to eliminate bottlenecks.	9/19/2012	Benni DeMarco Joe Vitullo	No	Identified	⇄
5	Single Points-of-Contacts (Key Personnel)	MAXIMUS and State functional POC's may have competing priorities that will hinder their ability to respond in a timely manner.	Secondary Risk - Related to Risk 6	Communications	5	4	20	Identifying multiple Points-of-Contact for each functional and technical area from MAXIMUS and state to eliminate bottlenecks.	9/19/2012	Benni DeMarco Joe Vitullo	No	Identified	⇄



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ID	Name (Root Cause)	Risk Description (Event)	Impact	Category	Prob	Impact	Score	Mitigation Strategy	Mitigation Due Date	Risk Owner	RRP Comp	Status	Tr d
6	Procurement Process	Delays in procurement process may negatively impact project schedule.	Inability to acquire resources in a timely manner may negatively impact related activities in the Project Schedule.	Procurement	3	5	15	Add lead time as early as possible. Evaluate procurement requirements during the change order process. Make sure Commerce procurement staff members are engaged in the PO development process.			No	Identified	↕
7	Approach to Requirements Definition	Iterative approach to requirements development and validation. Detailed requirements and process models are being finalized during the development sprints.	Secondary Risk - Related to Risk 1	Business Requirements				MAXIMUS is documenting the system development methodology including how and when documents such as the Requirements Validation Documentation will be updated during each sprint iteration.				Identified	↕
8	Integrating COTS Release Schedule into Development Sprint Scope and Schedule	Each COTS product has a separate release schedule than the project schedule. Project must consider and manage this fact during the planning of project activities and the completion of project deliverables.										Identified	↕

Table 5 – Initial Project Risks