

Request for CalHEERS Development and Operations Services  
 SEIU Final Comments

General					Cosmetic	Reviewer	
ID	Y/N	Section #	Page #	Req #	Description	Y/N	Organization
1	Y				Thank you for the opportunity to comment on this ambitious effort to solicit comprehensive and thorough bids from vendors with the experience and qualification to bring CalHEERS online. We are humbled by the scope of the project, and mindful of the timeframe and difficulty you face in addressing and incorporating many stakeholders' interests and expertise here. All told, SEIU represents over 800,000 workers in California. It is not only the largest union in the state, it is the largest union of healthcare workers and the largest union represent county eligibility workers. Our workers are all, of course, health care consumers, many insured, quite a few	N	SEIU California
2	Y				We are grateful that the Exchange staff is working overtime to get the IT piece of this program moving in the right direction. We are grateful for the attention to detail, breadth and scope you have already made. We have some general and some specific comments. Overall, we have 3 main points that we will flesh out with specific comments below: 1) We want to see integrated horizontal eligibility whereby people are able to determine eligibility for multiple programs at the same time; 2) we see, and want clarification that CalHEERS sees, counties as the primary in-person option and 3) in last week's Exchange board meeting, there was an assurance given	N	SEIU California
3	Y				Finally, we have thoroughly reviewed the comments submitted by the County Welfare Directors Association and by the advocates (including Health Access and Western Center on Law and Poverty). We would like to incorporate all of their comments by reference. We share every one of their concerns. We have taken the liberty of reiterating some key points below that are more squarely within our own area of expertise.	N	SEIU California
4	Y				We were gratified to hear in the presentation on 12/20/11 that you are bidding out both a centralization and decentralization of the MAGI Rules Function. However, the draft RFP is very vague on the relationship between the SAWs System and CalHEERS. We look forward to reviewing the CalHEERS organizational chart and think it will be helpful to lay out clearly DHCS's leadership role alongside the Exchange here.	N	SEIU California
5	Y				The RFP reads as if a new state entity will be created: CalHEERS. Moving forward, whether in the context of IT, or otherwise, SEIU would like clarity about this new state entity: The RFP was unclear on the specific role, oversight and staffing of CalHEERS. SEIU believes that public employees will provide the best services to clients as we do in many other systems across the state. Any newly created state department should be staffed with state employees and that - exempt employees should be part of the civil service system and afforded its protections. This would include any call center employees who might be supporting the IT function.	N	SEIU Local 1000

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6	Y				The RFP fails to clearly describe how the SAWS system interacts with CalHEERS or how existing county systems will interface with the MAGI rules engine. In order for county eligibility staff to appropriately provide eligibility determinations for all human service programs there needs to be a seamless interface between SAWS and CalHEERS.	N	SEIU California
7	N	Requirements	Business	24	The RFP should be clear where this information will be sent for processing and who will process it.	N	Harbage Consulting for SEIU California
8	Y				The RFP is unclear on the required system functionality necessary to integrate all human service programs.	N	SEIU California
9	Y	Requirements	Business	43	The RFP must clearly explain the relationship proposed here between CalHEERS and SAWS. This requirement is notable only in its implication that CalHEERS and SAWS are in communication with each other in the intended system and the role for SAWS is preserved.	N	SEIU California
10	Y	Requirements	Business	62	"The CalHEERS shall provide summary information on each plan's programs to foster healthy living, care coordination, case management, shared decision-making, patient safety, and other ways to promote health and wellness for each plan selected for comparison." We are encouraged by this statement. It is vital that plans play these roles.	N	SEIU California
11	Y	Requirements	Business	107	Eligibility and enrollment, case management, "The CalHEERS shall provide the functionality for consumers, Assisters and Eligibility Administrators to view an applicant or enrollee account information including the household members and their respective health coverage and eligibility status. This will include household members that are / may be eligible for non-MAGI Medi-Cal." This sentences raises questions about the role of the people who are currently responsible for assisting enrollment in programs every day--county workers. We request that the RFP include county workers in this list.	N	Harbage Consulting for SEIU California
12	N	Requirements	Business	178	"The CalHEERS shall have the functionality to display a dashboard of caseload and performance metrics for active applications, renewals and appeals." While SEIU supports this functionality, it raises questions about whether or not this system will replace current county systems. Again, the RFP is unclear on if the new system will interact with SAWS.	N	SEIU California
13		Appendix H	5		The section regarding "Existing Eligibility Systems" does not acknowledge that county welfare offices will receive in-person applications from individuals who are eligible for MAGI Medi-Cal. We recommend that the RFP clarify the counties' role in the MAGI Medi-Cal eligibility determination process.	N	SEIU California

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14	N	Requirements	Business	195	"The CalHEERS shall provide the functionality to track referrals made to SAWS and update disposition from MEDS." The RFP needs to clearly articulate a vision for the overall interaction with SAWS--not just technical specifications.	N	Harbage Consulting for SEIU California
15	Y	4.47	Apr-38		The RFP seems to only reference a one - way interface from CalHEERS to all other programs. We assume a two way interface, from others systems to CalHEERS is essential eligibility and enrollment and should also be appropriately described in the solicitation.	N	SEIU California
16	Y	1.4.1	eight		"Contains the Business Rules and technical capabilities to determine online, real-time eligibility for all Exchange Health Services Programs, Healthy Families and for Med-Cal income based eligibility. Counties will continue to determine eligibility and maintain case data for non-MAGI Medi-Cal cases and other programs." This sentence seems to contradict the notion that the RFP is to design a system to interact with SAWS. The sentence should be replaced by one clearly specifying the ongoing role of SAWS.	N	Harbage Consulting for SEIU California
17	N	1.4.3	10-Jan		"Gap analysis", " <b>Support for New Programs, Eligibility Determination, Financial, Reporting, and Other Administrative Processing</b> – As is true elsewhere, system logic to support premium tax credits, reduced cost-sharing. MAGI processing and other Affordable Care Act-specific functionality does not exist in our current systems." There are no existing systems that support premium tax credits or other ACA specific functions. It's not clear if existing systems can address MAGI processing.	N	Harbage Consulting for SEIU California
18	N	3.1	twenty-seven		<b>Vendor qualifications.</b> The vendor qualifications appear so specific that only one or two vendors could meet them. We'd rather see an emphasis on a demonstrated track record sufficient to assure that they can produce the required functionalities in the stated time frame--that would include knowledge of the specifics of California's existing public eligibility systems. Moreover, vendors selected should certify that they are willing to make all information on their approach and operations public.	N	SEIU California
19	Y				We are unclear on stakeholder process, whether there is one and how it is to take place in the context of developing the IT system. We urge you to create further specificity and to include labor and specifically health care workers, county eligibility workers, and state employees in it so that their unique knowledge of eligibility and enrollment issues can be taken into account.	N	SEIU California

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20	Y	4.3	four- thirty one		<b>Business/functional scope</b> Here it states, "The primary business objective of CalHEERS is to provide a "one-stop shop" to determine eligibility for non-subsidized coverage for individuals in the Exchange and all Exchange Health Services Programs, which include Modified Adjusted Gross Income (MAGI) Medi-Cal", etc. It is our fervent hope and belief that the purpose of CalHEERS is to provide a platform for the Exchange to interact with the rest of the existing programs--in short, making no wrong door a reality. Yet, the strength of this statement and its stated mission suggest that there is in fact only one right door--CalHEERS. Moreover, while it was stated in the public board meeting last week that the Exchange would be bidding out the functionality of housing the MAGI rules engine either in CalHEERS or in the SAWS system, the RFP states that the very mission of CalHEERS is to centralize the MAGI rules function. The conflicting statements raise concern about the validity and integrity of the proposal to bid both options.	N	SEIU California
21	Y	4.4	4-20		<b>Provide Single "Front Door" for all Eligibility Services.</b> This seems to be an explicit contradiction of "no wrong door". It is unclear if the approach envisioned by the solicitation is based on the no-wrong door approach vs. single-entry approach to eligibility and enrollment. The RFP should be clear if CalHEERS will supersede existing eligibility determination programs or if it is simply a clearinghouse for those programs.	N	Harbage Consulting for SEIU California
22	Y	4.6.4.1 & 4.6.4.2	4-59		The RFP states that implementation would include organization change management to prepare user groups and training of all business and technical users of CalHEERS. The document should specify who will do this and what standards will be used.	N	Harbage Consulting for SEIU California
23	Y	4.6.4.3	4-59		Engagement and education of local and county entities providing OERU services. Outreach and enrollment into public programs is complex and challenging enough for many to require specialized assistance. The contractor should be required to provide educational materials (on an ongoing basis) on how to use the new tools--and better yet teach classes to the county workers who use the system.	N	Harbage Consulting for SEIU California
24	N	4.3.5 & Attachment 3	4-8	BR215	The RFP indicates a requirement for an online e-chat help function. The document should specify who will staff this function? State workers? County? Vendor?	N	
25	N	4.3.2	4-5-8		The RFP specifies a requirement for the system to do individual premium aggregation. The document should also specify a corresponding function for family or employer premium aggregation?	N	
26	Y	1.4.2	1-9		Improved information flow between systems at the state and local level to ensure that the appropriate information is available to those seeking coverage and those providing OERU services. Appropriate interfaces are needed between CalHEERS, MEDS, and other eligibility IT systems in California to allow information to flow between various programs and eligibility systems. It should also provide the appropriate information to those determining eligibility, and those providing application assistance, which are two different functions.	N	SEIU California

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27	Y	4.3.5	4-8		The RFP should be specific as to the role of current eligibility workers with CalHEERS.	N	SEIU California
28	Y	4.3.5	4-8		The RFP should be specific as to whether or not assisters will be certified or licensed, and the role of the vendor in that process. The RFP is does not mention navigators, their role, and training requirements. Will there be an opportunity for stakeholder input on these issues?	N	SEIU California
29	Y	4.3.5	4-8		Consumer Assistance states under Plan and Benefit Assistance that the system will provide a link to a list of local assisters that include interactive maps. Will the system also link to assisters at the state level, such as assisters under the Office of Patient Advocate (OPA) as envisioned under AB 922 (Monning), Chapter 552, Statutes of 2011?	N	Harbage Consulting for SEIU California
30	Y				There is insufficient guidance about how phone, mail and in-person applications will be handled. The RFP provides for consumers to be able to update information numerous ways and get assistance by phone and email, the RFP does not include functionality for the acceptance and processing of mail-in, phone and in-person applications. Functionality should also be included to allow a paper application to be scanned and subsequently be processed electronically.	N	SEIU California
31	Y	4.3 - Table 10	Apr-32		The basic interaction with other human services programs should be a core functionality and not an optional functionality.	N	SEIU California
32	N				Back Up system - "This RFP calls for the vendor to host the system in a separate facility within 30 miles of the state capitol and provide a backup site within the continental US. " We would request that the back up site also be located in the state of California so that our public employees have an opportunity to operate the system?	N	SEIU Local 1000
33	Y				Please define the term user, authorized users, and end - user.	N	SEIU California
34	N	4.3.1	1-Apr		Describe way that clients will be notified of change in eligibility due to their circumstances and how we will seamlessly enroll clients in the program they are eligible for.	N	SEIU California
35	y				The RFP is unclear on what entity will "own" the user information and case data. Since the system is intended to interface with IRS, Homeland Security and Social Security as well as EDD, banks and the SCO, the system could end up with 20,000 users (i.e., federal users, county workers, exchange staff, auditors, insurance carriers, state staff who haven't been included) and millions of cases (people who log on or call in (another component) and even start the process of looking for medical insurance. How will we ensure confidentiality and client protection ? and who will be held liable if a breach occurred?	N	SEIU Local 1000
36	Y				We applaud your decision to include MEDS modernization or replacement as a part of this solicitation. We believe that upgrading the MEDS system is essential to the success of this project.	N	SEIU California

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37	1a Scope	1.2	1.1		We agree with the health programs listed under the scope, but urge that they not be called "Exchange Health Services Programs" but rather "CalHEERS Health Services Program" given that DHCS continues to be responsible for administering Medi-Cal and MRMIB for Healthy Families and AIM.	N	SEIU California
38			1.2	1-2	We would urge that the "alternative approach" to case management - having the counties manage all Medi-Cal cases - both MAGI and non-MAGI, be clearly required in all bids. This approach has several advantages - keeping families' cases together when there are MAGI and non-MAGI beneficiaries and keeping a family or person's benefits together when they have CalFresh and/or income support as well as Medi-Cal.		SEIU
39			1.2	1-2	Top bullet point regarding integration of "other eligibility programs" it should specify what other eligibility programs and include SAWS.		SEIU California
40			1.3.2	1-5	Table 2 lists the Project Sponsors. It should clarify into which health coverage programs the Exchange enrolls individuals. The description of DHCS should spell out that the Medi-Cal program will continue, with the implementation of the ACA, to determine eligibility for Medi-Cal - both MAGI and non-MAGI.		SEIU California
41		4.3.1	4-1	BR-38	The functionality for CalHEERS to determine eligibility for Exchange, MAGI Medi-Cal, HF and AIM, included in the Business Requirements should also be included in the list of Functionalities/Services.		SEIU California
42		Appendix H	5		The section regarding "Existing Eligibility Systems" does not acknowledge that county welfare offices will receive in-person applications from individuals who are eligible for MAGI Medi-Cal. We recommend that the RFP clarify the counties' role in the MAGI Medi-Cal eligibility determination process.		SEIU California
43		1.2	1-2		The RFP should include the capacity to accept information from county programs - both LIHPs other county programs so that individuals receiving county services can, with their consent, be screened for eligibility and enrolled into Medi-Cal or the Exchange, as appropriate.		SEIU California