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## Administrative Simplification Enforcement and Testing Tool (ASETT)

### 08/27/2024 - CMS ECR (FedPath)

CMS OIT	SPARC IDIQ Contract #: HHSM5002017000451 Task Order #: 75FCMC19F0001  <b>Administrative Simplification Enforcement &amp; Testing (ASETT)</b>	CO: Adam Forgione, CO, 410-786-8354 <a href="mailto:adam.forgione@cms.hhs.gov">adam.forgione@cms.hhs.gov</a>  Gladys Wheeler, COR, 410-786-0273 <a href="mailto:gladys.wheeler@cms.hhs.gov">gladys.wheeler@cms.hhs.gov</a>	\$13,082,206.26	Base: 06/1/19- 05/31/20 OY1: 06/1/20- 05/31/21 OY 2: 06/1/21- 05/31/22 OY 3: 06/1/22- 05/31/23 OY 4: 06/1/23- 05/31/24	RELI manages the full spectrum of business process and related compliance and security services for the ASETT program.	Y – RELI provides project management support, including meetings and transitions. We support CMS in enforcing HIPAA, ACA, and other regulations by resolving complaints, conducting compliance reviews, and managing the ASETT system. We use dashboards to track and report compliance review activities, and our automated system improves audit communications. QA processes and training ensure consistent, high- quality record processing.
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### 12/21/2023 – CMS ASHEPS

#### CMS Administrative Simplification Enforcement & Testing Tool (ASETT)

##### Exhibit 1: CMS ASETT Narrative

<b>1. Client Name and Point of Contact</b>	Client: CMS POC Name and Title: Angelo Pardo, COR Phone: (410) 786-1836 Email: <a href="mailto:angelo.pardo@cms.hhs.gov">angelo.pardo@cms.hhs.gov</a>
<b>2. Contract Number</b>	HHSM-500-2017-000451
<b>3. Period of Performance</b>	6/1/2020 – 5/31/2024
<b>4. Role</b>	RELI Group, Inc. / Prime
<b>Project Description</b>	
RELI supports the CMS NSG, which acts on behalf of the Department of Health and Human Services, to oversee the Compliance Review Program and verify covered entities comply with HIPAA Administrative Simplification rules for electronic health care transactions. We are responsible for managing the full range of business processes, analytical services, and related compliance and security services for NSG in relation to the ASETT program. CMS's major challenge with this program was the burden of manually investigating complaints filed on paper	

## Administrative Simplification Enforcement and Testing Tool (ASETT)

forms and transmitted through the mail. With approximately 11 fulltime equivalents, we provide HIPAA enforcement as it relates to reactive complaint management and proactive compliance audits (PWS 3.2); recommend and implement system (Salesforce) enhancements using an Agile methodology (PWS 3.1); modernize ASETT on the Salesforce cloud platform; conduct HIPAA compliance audits; provide technical expertise related to X12, the National Council for Prescription Drug Programs (NCPDP), and Health Level 7 (HL7) standard transactions; conduct compliance review (audit) appeals (PWS 3.8) and assess civil money penalties; analyze HIPAA complaints (PWS 3.4); investigate complaints and determine validity and evaluate transaction testing results (PWS 3.6); and implement Corrective Action Plans (CAP) for HIPAA complaint resolution (PWS 3.3).

On a recent CPARS, the ASETT Contracting Officer's Representative (COR) said, "...[RELI's] enforcement team is well and expertly staffed. There are no incidents of coverage lacking. Contractor manages cross training of staff and oversees timely task completion. Contractor frequently responds to ad hoc CMS requests regarding special reports, and changes to standard operating procedures. Contract management has been consistently efficient and a proven asset for the CMS Enforcement Program."

**Relevant Technologies, Architecture, Stakeholders, Tools, or Methods:** The ASETT architecture is built entirely on the Salesforce Cloud and comprised of three sections: Site, Community, and Platform. External users' interface with the Community and Site section which are custom system pages developed using Visual Force and Apex to complete necessary process actions and monitor complaint status. Administrators manage complaints via ASETT Platform access which is configured using Salesforce's native declarative development style. Community and Platform users gain access using enterprise-wide Identity Management Authentication with two factor authentication. Non-registered users (site users) require no authentication as they are only permitted to view public pages they submit. After submission, they cannot access the pages again. Another relevant technology ASETT uses is Edifecs tools for testing transactions. Edifecs is a leading healthcare technology company with the mission to improve healthcare outcomes, reduce costs, and accelerate innovation by optimizing the end-to-end process of patient data interchange. The Edifecs tools integrated with ASETT empower our internal and external users to validate transactions against the established Accredited Standards Committee (ASC) X12 standards (PWS 3.1, 3.8, 3.12).

### 1. Identify new system enhancements functionality to support new business needs:

ASETT follows Salesforce application product lifecycle management which is the process of managing an application from design to final release. In the initial stages, we identify system changes from the users' perspective to deliver solutions that primarily focus on easing burdens the health care community faces when using ASETT. By engaging with users throughout the product lifecycle, we design and build solutions that enhance their overall experience (PWS 3.1).

For example, using feedback from the user group, we identified an improved method of tracking CAP milestones (PWS 3.7). The milestones are subtasks of the CAP, and each entity is required to notify us when completed. We found that the proposed enhancement would reap the following benefits for the program: allows additional details to be tracked and monitored, consolidates detailed milestone information into a single section of the case record, and provides the ability to capture an unlimited number of CAP milestone dates provided by the audited entity. The system's current state allowed only three milestone dates to be entered when most CAPs had more. Also, important information such as the violation number associated with the milestone, the description of the milestone, and the completion of the milestone were unable to be tracked. We presented this method to CMS who approved the change which our team then implemented.

### 2. Maintain Operations of a Salesforce Environment:

RELI successfully maintains and administers ASETT on Salesforce and supports operations that include HIPAA enforcement for transactions, code sets, unique identifiers, and operating rules (PWS 3.11). We perform software releases and provide operational support, meet functional and system requirements, and ensure configuration management. ASETT Sprint Releases typically occur every 2 to 4 weeks as planned in Sprint Planning based on the expected level of effort. Releases are scheduled to occur on the last Friday of a sprint after 5 PM ET to impact the fewest users possible. This is particularly important when deploying change sets since ASETT must be read-only while the code is put through test classes to verify its production suitability. The ASETT team also reviews and maintains user permissions quarterly and receives approval for users at their current access level. Any necessary changes are made based on CMS' request. The email distribution list is also reviewed and approved by CMS to confirm the appropriate users are included for each module, complaints, and compliance review. We review user login history, found in Salesforce, quarterly to determine if there are any users on unsupported browsers.

### 3. Implement enhancements using the Salesforce Enterprise Integration solution:

In September 2022, ASETT participated in a Salesforce Org Health Check, which is one of the Salesforce Enterprise Integration solutions (PWS 3.1). The team met with Denis Custodio, a Salesforce Success Guide, to conduct the session. Mr. Custodio reviewed ASETT's organization and provided us with a Health Assessment which included recommendations for Salesforce Best practices, as well as areas we could focus on to have a healthier implementation. Overall, ASETT was considered very healthy. We reviewed the Health Assessment to determine what we could do next as a team to implement enhancements.

As a result of the Health Assessment, we created sprint backlog tickets related to updating the application programming interface (API) version for Apex Classes, Apex Triggers, and Visualforce Pages. Another sprint backlog ticket was added for transitioning all Process Builder and Workflows to the newly recommended Flows. We are currently in the process of completing this transition development. A subtask was added for the development team to review Salesforce Major Releases in the Sandbox before the team completes regression testing for the release. Another new subtask was added to review the login history report quarterly to determine if there are any users who login on unsupported browsers. These updates not only keep ASETT functioning at its best, but also help us stay in line with Salesforce's innovations.

### 4. Contractor shall demonstrate experiences with multi-tier architecture, which includes:

#### a. IIS (Microsoft Web server Software)

Since Salesforce is a cloud-based Software as a Service (SaaS), IIS is no longer applicable.

#### b. ASETT (JAVA Server Pages)

Since Salesforce is a cloud-based Software as a Service (SaaS), Java Server pages are no longer applicable.

#### c. Relational Database (IBM UDB or Microsoft SQL Server or Oracle)

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ASETT uses Salesforce which is built on a Relational Database. Salesforce refers to tables as objects, and the objects can relate to each other with one-to-one, one-to-many, or many-to-many relationships. Since Salesforce is a cloud-based Software as a Service (SaaS), Salesforce controls the multi-tier architecture. However, the relation schema is created and maintained by our ASETT team. The data in ASETT is gathered through custom coded Visualforce pages.

### **d. Electronic Data Interchange (EDI) Transaction Comparison Testing tool engine.**

RELI helped drive the development and implementation of new HIPAA transaction testing tools, Transaction Management (TM) and Onboarding and Testing Cloud Services (OTCS), which were tailored and customized to meet the needs of the ASETT program, as discussed in **Requirement 12** below.

### **5. Demonstrate adherence to all Federal requirements to support Information Security Programs and Requirements:**

RELI maintains accurate security control implementation descriptions and critical security documentation (e.g., Privacy Impact Assessment, Information Security Risk Assessment, Security Assessment Report, System Security Plan, and Contingency Plan in the agency's Federal Information Security Modernization Act (FISMA) reporting governance, risk, and compliance tool (e.g., CMS's FISMA Continuous Tracking System (**PWS 3.15**)). We also support the preparation for the annual Adaptive Capabilities Testing (ACT) by regularly assessing control effectiveness via automated security assessments, Security Impact Analysis of system Change Requests, and Plan of Actions and Milestones (POA&Ms) resolution. The ACT results in POA&Ms, and we develop CAPs for all identified weaknesses, findings, gaps, and other deficiencies, as directed by the Information System Security Officer or CMS Contracting Officer's Representative (COR).

### **6. Demonstrate support and enhancements of electronic case-management system(s):**

On the ASETT program, RELI manages the full spectrum of business process and related compliance and security services. Initially designed as a complaint intake system, the ASETT system was moved to the Salesforce platform, expanded, and enhanced to manage additional functions, including monitoring covered entities' compliance with HIPAA standards for Administrative Simplification. Our team has enhanced ASETT to make complaint entry more efficient for end-users.

### **7. Recommending and implementing system enhancements using Agile methodology:**

RELI uses an Agile methodology to recommend and implement Salesforce enhancements that modernize ASETT on the Salesforce cloud platform, building new modules to address business needs as they arise. We interview users and perform user research to identify opportunities for improvement (**PWS 3.1, 3.13**).

Before the start of each sprint, the team holds a sprint planning meeting where the team reviews the product backlog and decides how much work (how many backlog items) may be completed given the resource availability. After agreeing on scope, the team reviews user stories to verify the scope is appropriately articulated and acceptance criteria is clearly defined so there is a shared understanding of the definition of done. The team typically sprints for two weeks (up to four weeks). At the conclusion of the sprint, the team performs a Sprint Review, demonstrating the functionality to CMS and other stakeholders to obtain a Go or No-Go decision (**PWS 3.1, 3.13**).

### **8. Working with the HIPAA requirements in the Health Insurance Portability and Accountability Act of 1996 and the Patient Protection (HIPAA) and Affordable Care Act (ACA):**

As the ASETT incumbent for the past 4 years, and with a team comprising over 50+ years of HIPAA transaction and code set experience, we are industry experts and trusted NSG partners working with the requirements in the HIPAA and ACA (**PWS 3.2**). These legislations set national standards for transactions, code sets, unique identifiers, and operating rules to be followed by the healthcare industry covered entities such as health plans, providers, and clearinghouses. As part of our day-to-day tasks and responsibilities on the current contract, we provide administrative, analytical, and technical support to CMS for the non-privacy and non-security provisions of HIPAA, ACA, and other relevant regulations. One of our main achievements in this area was developing and maintaining the current ASETT system that is integral to the HIPAA and ACA enforcement initiative (**PWS 3.11**). Additionally, we support CMS in the investigative process for uncovering noncompliance issues with the national standards (**PWS 3.6**). Our extensive knowledge of HIPAA and ACA allows us to apply subject matter expertise to each investigation to assess for potential noncompliance. Reviewing and analyzing HIPAA and ACA violations in addition to our attendance and participation with standards-setting organizations and industry organizations such as Workgroup for Electronic Data Interchange (WEDI) and the Council for Affordable Quality Healthcare (CAQH) help us stay abreast of new developments in standards and compliance requirements. This not only allows us to make accurate determinations and outcomes of each investigation, but we can also readily modify the ASETT tool to accommodate such changes (**PWS 3.6**). As part of this work, we generate draft letters when NSG has reviewed and approved the complaint recommendation following all related requirements (**PWS 3.5**). In addition to formal letter communication, we are responsible for communicating with parties via telephone, email, and electronic mailbox.

On a recent CPARS, the ASETT COR said, "Contractor is well versed and up to date on HIPAA regulations. Contractor participates in external professional HIPAA standard setting organizations, and industry stakeholder webinars and conferences. Contractor raises HIPAA regulatory policy decisions for discussion with NSG."

### **9. Customer service skills for collaborating with entities during HIPAA compliance reviews and complaint resolutions:**

To date, RELI has participated in dozens of compliance reviews and hundreds of complaint resolutions (**PWS 3.8**). As part of our trusted and effective process, we take numerous measures to communicate with the complainants and violating entities to ascertain accurate details and make an accurate determination. This includes communicating with entities via email, direct phone calls, letters, system-generated notifications, as well as facilitating conference calls for the entities to communicate directly. For compliance reviews (**PWS 3.8**), we conduct training sessions with each entity we audit to provide an overview of ASETT, instructions for use, and to educate them on the compliance review process and what to expect from start to finish. Some of our underlying skills that support our exceptional customer service are active listening, attention to detail, collaboration, critical thinking, decision-making, time management, problem solving, and product knowledge. We have received countless emails from entities commending us on successful conference calls and training sessions. We also work in a small, cross functional

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team, so effective time management allows us to complete tasks on or ahead of schedule while upholding our commitment to customer service by remaining attentive to the needs of the entities (PWS 3.7).

### **10. Conducting HIPAA transactions and code sets compliance audits and have participated in a compliance program that includes audits and required corrective action plans (CAPs):**

Shortly following inception of the CMS Compliance Review Program in 2019, RELI was awarded the ASETT contract, and our SMEs assumed responsibility for the process of randomly selecting entities and conducting compliance audits. The CMS Compliance Review Program assists covered entities in identifying vulnerabilities in achieving compliance with standards and operating rules, identifying areas for improvement, and determining if consistent policies and procedures are in place (PWS 3.1). These assessments have helped identify areas for education and outreach. Our assessments also lead to the future development or revision of standards and operating rules that may then be recommended to the Standard Development Organizations and Operating Rule Authoring Entity. We determine whether the selected covered entity is compliant with electronic standards by reviewing and validating electronic transactions using third party validation software, reviewing operating rule processes and data, capturing operating rule attestations, entering results into a tracking system, creating a summary of the assessment outcomes, sending assessment notices to the covered entity, and facilitating a corrective action process when warranted. Through this process of conducting compliance reviews (PWS 3.8), RELI identified covered entities that are non-compliant with HIPAA and ACA requirements, determined that corrective action was warranted, and subsequently provided the entity with a template to create a plan to achieve compliance. We then monitored the CAPs through to completion, requiring regular status checks and milestone updates from each entity.

The ASETT Compliance Review Tracker is a module within the tool used to coordinate, track, and manage compliance reviews (PWS 3.8). We capture demographic information about the covered entity being assessed, documents and artifacts to conduct an assessment, assessment and corrective action statuses, notices to the covered entity, and statistical data to conduct analysis and capture trends. All communications and documents exchanged with the covered entity are uploaded to the Compliance Review Tracker. This tracker provides the status and assignment of a compliance review record and includes the Next Action and which role should perform that action. During the assessment and corrective action processes, time-sensitive items, such as artifacts, notices, and responses, are exchanged between the Assessment Team and the covered entity.

### **11. Technical expertise related to X12, NCPDP, and HL7 standard transactions:**

Our technical experience related to X12, NCDPCP, and HL7 standard transactions is evidenced by our team of experts with more than 50 years of collective HIPAA compliance experience specializing in ASC X12 health care transactions and related systems. Our experts' experience in the healthcare industry includes providing operational, system development, and maintenance support for implementing standard transactions, including requirements gathering, gap analysis, data mapping, testing, data and systems analysis, regulatory compliance, and independent verification and validation. A member of our team, Katie Sullivan, served as secretary of the X12 837 transaction workgroup for 16 years, Vice Chair and Chair of the Insurance Business Process Application Error Code industry group for 3 years, and completed the HL7 Fundamentals course through HL7.org. She is also a former Co-Chair of the X12N/TGB/WG4 sub workgroup that is responsible for the development of the 820 Technical Reports (TR3/Implementation Guides) (PWS 3.14).

Our experts have conducted covered entity compliance reviews (PWS 3.8) of ASC X12 health care transactions, code sets, and operating rules; assisted with troubleshooting technical issues pertaining to ASC X12 health care transactions; communicated outcomes to partners; and developed procedures and written documentation such as standard operating procedures (SOPs). We continue to participate in industry workgroups and contribute to the development of white papers, operating rules, and new standards (PWS 3.14).

### **12. HIPAA transaction testing tools:**

ASETT allows users to test transaction files for HIPAA compliance through a third-party testing tool (XEngine) that was integrated into ASETT. Within the past year, RELI provided thought leadership and the technical knowledge to drive the development and implementation of more sophisticated testing and software tools with additional capabilities. These new HIPAA transaction testing tools, TM and OTCS, were tailored and customized to meet the unique needs of the ASETT program and reduce manual workload burden to increase the number of compliance reviews conducted annually while allowing entities to independently self-test transactions (PWS 3.6).

Our experience with HIPAA transaction testing tools is extensive. We use the tools to test transactions during the Compliance Review process, and having a thorough understanding of the output is essential to efficiently documenting the audit and communicating findings to the entity. For example, SNIP Type 5 indicates an external code set error and should be categorized as code set. We review the output of the validation tools and establish which errors represent violations that we would cite on our audit. For example, warning errors and informational messages are not counted as true errors. After we determine if each normal violation is valid for assessment purposes or needs further investigation (PWS 3.6), we create a violation form in the Compliance Review record in ASETT which feeds into the official Findings Report.

### **13. Conducting compliance review (audit) appeals and assessing civil money penalties:**

When we determine a covered entity is non-compliant with the electronic standards, our goal is to assist the covered entity in becoming compliant. Compliance can be achieved by way of instituting a CAP and correcting deficiencies (PWS 3.7). Should a covered entity not follow through and abide by the CAP and correct their deficiencies, or not cooperate with the assessment and investigation process (PWS 3.6), they are subject to civil money penalties (CMPs). CMS has not assessed any CMPs against covered entities for violations of HIPAA Administrative Simplification rules but is authorized by the statute to do so and is in the process of creating guidelines to begin imposing these penalties. RELI maintains an initial draft of an SOP document for

**Administrative Simplification Enforcement and Testing Tool (ASETT)**

CMPs and has worked with CMS to institute a framework to support the CMP process. The draft document elaborates on the investigation process, liability, determination of the penalty amount, the grounds for waiver, hearing, and the appeal process.

**14. Analyzing HIPAA complaints that may be filed by external entities; and evaluating transaction testing results:**

RELI's experience analyzing HIPAA complaints filed by external entities includes our work on the CMS ASETT contract since 2019 (PWS 3.2). When new complaints are submitted in ASETT, our team analyzes each one and makes recommendations to CMS for the next steps (PWS 3.4). One of the first steps in analyzing HIPAA complaints is the preliminary evaluation. During this process, we complete an initial review and check for missing or incomplete information such as demographics, transaction files, and other supporting information (PWS 3.3). We determine whether it is valid for ASETT or invalid and should be referred to another organization. HIPAA Privacy and Security complaints are out of scope for ASETT and subsequently referred to the Office for Civil Rights. Depending on the nature of the complaint, we locate an appropriate agency to assist further.

For complaints that are related to HIPAA Administrative Simplification, we deem those valid and assign to an Enforcement Analyst and SME to analyze each complaint and make a recommendation to CMS (PWS 3.4). We use the HIPAA and ACA regulations, CORE Operating Rules, training materials, SOPs, past complaint outcomes, and other supporting information to evaluate each complaint. The Complaint Review and Recommendation (CRR) form we complete and share with CMS provides a summary of our analysis, the relevance to a specific HIPAA and ACA regulation, and a recommendation for pursuing the investigation. In addition to evaluating transaction testing results with compliance reviews, we evaluate transaction testing results when analyzing complaints. To prove noncompliance, complainants typically upload the error file received after testing a transaction. Having a thorough understanding of the error report gives us the necessary understanding needed to pursue the complaint with the filed-against entity and demand corrective action, when applicable.

**15. Conducting statistical analysis and regularly reporting complaint and compliance review data on developed standard reports as well as any ad-hoc reporting:**

RELI provides weekly, monthly, and ad hoc administrative reports. Some of these reports are published on the CMS website for industry consumption. For complaints, statistics include the number of new complaints opened and resolved complaints closed in the reporting period, the type of complaint by regulation type and by regulation citation and standard. Complaint-related reports include aging reports that show how long each complaint has been open and unresolved. We also provide statistics on compliance reviews such as the number of new reviews in the reporting period, categories and status of existing reviews, reports of entities in corrective action, and reports on the violations discovered (PWS 3.9).

We provide the CMS ASETT team with reports of individual assignments, next required steps, and overdue tasks. These reports help facilitate the complaint management process and make sure actions are completed in a timely manner. On an ad hoc basis, RELI provides a variety of reports as requested by CMS. The above-referenced reports are instrumental in the success of the current ASETT program as interpretation of complaints and compliance review data help uncover patterns and trends to recommend process improvements (PWS 3.1).

**04/22/2024 - Centers for Medicare and Medicaid Services (CMS) Unified Case Management (UCM)**

**Exhibit 2: Demonstrated Knowledge or Experience in the Investigative Processes within Healthcare Services**

**Relevant Corporate Experience**

**Administrative Simplification Enforcement and Testing Tool (ASETT):** The ASETT is a web-based application that enables individuals or organizations to file a Health Insurance Portability and Accountability (HIPAA) and/or Affordable Care Act (ACA) complaint against a healthcare provider, health plan, or clearinghouse for potential non-compliance with HIPAA provisions. When a complaint is filed, SMEs use HIPAA and ACA statutes, relevant regulations, Committee on Operating Rules for Information Exchange (CORE) Operating Rules, adopted standards, implementation guides, and other information within the healthcare industry to evaluate the complaint and determine if it is acceptable for investigation. Upon complaint acceptance, enforcement analysts begin the investigative process and initiate contact with complainants and filed against entities (FAEs) via formal letter, email, and conference call to verify the submitted data, acquire any missing data, confirm contact information, and request supporting documentation. This information is loaded into the ASETT system and used to investigate the evidence within the complaint against relevant HIPAA standards, regulations, and statutes to determine violation. If an FAE is found non-compliant, enforcement analysts aid them in formulating a corrective action plan (CAP) complete with tasks, milestones, and target completion dates to adequately correct identified noncompliance. enforcement analysts track the progress of each CAP and monitor the completion of each task by initiating contact with the FAE on the target completion date assigned to each milestone to assess its completion. Once all steps correcting noncompliance are

complete, the enforcement analyst collects supporting documentation to verify system upgrades, trading partner agreements, portal revisions, and website changes implemented. The enforcement analysts collaborate with SMEs to examine this documentation and investigate each complaint to confirm if the corrective actions taken satisfy the allegations of the complaint and if the FAE demonstrates compliance with HIPAA regulations, or if the FAE requires further action. Once an FAE is deemed compliant, the enforcement analysts compose formal closure letters to the FAE and the complainant to inform them that the noncompliance is remediated, and the complaint is closed. With the volume of new complaints reaching up to 28 per week, our enforcement analysts initiate an average of 30 weekly phone contacts to either launch or monitor the investigative process and enforce HIPAA compliance. ASETT maintains over 300 CAPs, monitors over 1,500 milestones, and produced over 4,000 complaint-related notices, letters, data requests, and CAP-related inquiries resulting in successful closure of over 2,800 complaint and compliance reviews.

### 10/24/2023 - Centers for Medicare & Medicaid Services (CMS) Customer Support Front End System (CSFES)

3. Familiarity with open-source software and commercial software such as, but not limited to: Informatica Power Center, Oracle Enterprise Database, Oracle Golden Gate, MicroStrategy, Scripts for Data Base, and Informatica Mappings & Workflows.

Customer & Contract Name	Prime Contractor	Role of Subcontractor	Period of Performance
Centers for Medicare & Medicaid Services (CMS) ASETT	RELI Group	Our subcontractors on ASETT provide business analysis support.	6/1/19 - 6/1/24

Description of Relevant Services: The ASETT is a tool developed to help healthcare providers, insurers, and other stakeholders assess their compliance with Health Insurance Portability and Accountability Act (HIPAA) administrative simplification regulations related to electronic transactions. Through ASETT, Team RELI helps CMS reduce administrative burden and advance standards for healthcare transactions. On ASETT RELI leveraged two commercial products, Salesforce and Edifecs XEngine solution, configuring the solution to support users, CMS use cases and leverage the value of proven commercial products. RELI is responsible for recommending and implementing system (Salesforce) enhancements and modernizing ASETT on the Salesforce cloud platform, building new modules to support the Compliance Review program and Industry Pilot, and continuing to implement system enhancements. As part of RELI's Salesforce Cloud platform experience on ASETT, the team re-designed the ASETT Java EE application to Salesforce; coded, tested, implemented, and maintains the ASETT Salesforce application; and configured the Salesforce implementation of ASETT to integrate with Salesforce Enterprise Integration (SEI). In fact, ASETT was the CMS' first application to successfully integrate with SEI.

The ASETT contract supports this proactive adherence to HIPAA standards by offering a free, easy-to-use online testing service. In partnership with Edifecs, RELI deployed a COTS HIPAA transaction testing system that allows for the testing of transaction files for HIPAA compliance, with or without filing a complaint. Team RELI presented the ASETT programs at the HIMSS 2023 Interoperability Showcase. We provide integration services related to the Edifecs XEngine tool. This integration triggers a process that maps to the success of the request which gives us the file validation results in a zip format from the XEngine service. The html report is then extracted from the zip file and displayed to the end user.

As transaction standards continue to evolve – particularly with CMS 0057-P - Team RELI will provide CMS with the gold standard for transaction quality and an intuitive experience that reduces the burden of compliance for providers and health plans.



## Administrative Simplification Enforcement and Testing Tool (ASETT)

### 8/21/2023 - CERT Review Contractor - Sources Sought Notice (SSN)

**Centers for Medicare & Medicaid Services (CMS) Administrative Simplification Enforcement and Testing Tool (ASETT):** Team RELI provides Salesforce case management customization, deployment, maintenance, and operational support for ASETT. Team RELI performs in-depth analysis of current complaint management processes, procedures, makes recommendations for improvements, and develops a timeline for implementation of those changes. Team RELI identified opportunities for improvements and enhancements that increased staff efficiency and effectiveness in managing complaints and compliance reviews in a timely manner. We successfully implemented the case management framework for our customers using thorough intake, assessment of process needs, service planning, monitoring, and evaluation of the end-to-end process. The HIPAA ASETT Salesforce system is currently integrated with CMS Salesforce Enterprise and is in production with an ATO. Maintenance and enhancements of the ASETT system also involve integration with the following CMS enterprise-wide Shared Service applications: Enterprise Identity Management, Enterprise Portal, Master Data Management, and Enterprise Salesforce. Additionally, the ASETT Salesforce application offers Team RELI the opportunity to evolve the Administrative Simplification program through expansion and modernization of the existing ASETT Web-based application. Team RELI works with CMS to address new business requirements through modernization and satisfy the objectives of meeting CMS TRA. We address compliance requirements for CMS Enterprise and implement and customize key features such as multi-user access, workflow and scheduling capabilities, centralized database, data analysis tools and stringent security standards.

### 06/09/2023 - Centers for Medicare & Medicaid Services (CMS) Health Plan Management System (HPMS) - Website Maintenance and Enhancement Services

Contract Name	Agency	Total Contract Value	Period of Performance
Administrative Simplification Enforcement & Testing Tool (ASETT)	CMS	\$15,095,536.6	06/01/19 - 05/31/24
<p>Description of Relevance Services: On the ASETT program, RELI Group provides Agile Project Management to the National Standards Group (NSG) within CMS. Our team manages the contract through completion to ensure proper and timely implementation of technical and/or business solutions, schedules, objectives, budgets, and milestones. This includes applying domain expertise to business problems, developing, and defining strategic visions, and providing client representation.</p> <p>Our team manages and executes the program with an optimum balance between governance and Agile testing solutions, covering the full spectrum of the ASETT program. As part of the planning process, we meet with CMS to collect enhancement requests. After collecting the requests, we create a backlog and prioritize future enhancements in backlog grooming sessions with the relevant stakeholders such as client team, project team, Scrum Master, and Product Owner. The requirements for ASETT are maintained using a Requirements Document and user stories created in Agile Accelerator, a Salesforce tool. Additional requirements are gathered in various meetings and through mockups of requests from stakeholders. RELI also manages all associated security requirements and standards.</p>			



## Administrative Simplification Enforcement and Testing Tool (ASETT)

### Section 508 Compliance, Remediation, and Reporting

Contract Name	Agency	Total Contract Value	Period of Performance
Administrative Simplification Enforcement & Testing Tool (ASETT)	CMS	\$15,095,536.6	06/01/19 - 05/31/24
Description of Relevance Services: On the ASETT project, RELI Group is responsible for maintaining 508 accessibility of Electronic and Information Technology (EIT) and ensuring that all documents and deliverables are 508 compliant.			

### 06/08/2023 - RMADA 2 BRIA

Administrative Simplification Enforcement & Testing Tool (ASETT)			
Contract Number	75FCMC19F0001 / HHSM5002017000451	Period of Performance	06/01/2019 – 05/31/24
Customer Agency	CMS	Prime or Subcontractor	Prime
Total Contract Value	\$15,095,536.60	CO Details	Yadira Kelly; (410) 786-5053
<b>Contract Description and Relevancy to SOW</b>			
<p>The CMS National Standards Group (NSG), which acts on behalf of HHS, oversees the Compliance Review Program to ensure that covered entities comply with HIPAA Administrative Simplification rules for electronic health care transactions. RELI is responsible for managing the full range of business processes, analytical services, and related compliance and security services for NSG in relation to the Administrative Simplification Enforcement &amp; Testing Tool (ASETT) program. The Government's major challenge with this program was the burden of manually investigating complaints filed on paper forms and transmitted through the mail. With approximately 11 fulltime equivalents, we provide HIPAA enforcement as it relates to reactive complaint management and proactive compliance audits; recommend and implement system (Salesforce) enhancements using agile methodology; <b>modernize ASETT on the Salesforce cloud platform</b>; conduct HIPAA compliance audits; provide technical expertise related to X12, NCPDP, and H17 standard transactions; conduct compliance review (audit) appeals and assess civil money penalties; analyze HIPAA complaints; investigate complaints and determine validity and evaluate transaction testing results; and implement corrective action plans for HIPAA complaint resolution. RELI used an agile methodology to recommend and implement a Salesforce enhancement that involved modernizing ASETT on the Salesforce cloud platform, building new modules to support the Compliance Review program and Industry Pilot, and continuing to implement system enhancements.</p> <p><b>Relevancy to Task 1.0 – Kickoff Meeting:</b> As a prime, RELI has successfully attended the kickoff meeting on the ASETT contract.</p> <p><b>Relevancy to Task 2.0 – Project Management Plan and Reporting:</b> RELI Group provides Agile Project Management to the NSG within CMS. Our team manages the contract through completion to ensure proper and timely implementation of technical and business solutions, schedules, objectives, budgets, and milestones. This includes applying domain expertise to business problems, developing and defining strategic visions, and providing client representation and support.</p> <p><b>Relevancy to Task 3.0 – Data Impact Analysis:</b> Health care providers, health plans, and clearinghouses have encouraged HHS to take proactive steps, including reviews, to ensure compliance with Administrative Simplification transaction standards, which reduce the <b>administrative burden</b> on the health care industry. The ASETT contract supports this proactive adherence to HIPAA standards by offering a free, easy-to-use online testing service. In partnership with Edifecs, RELI built a HIPAA transaction testing system that allows for the testing of transaction files for HIPAA compliance, with or without filing a complaint. RELI's Program Manager presented this HIPAA transaction testing tool at the Edifecs booth at the HIMSS 2023 Interoperability Showcase area.</p> <p><b>Relevancy to Task 4.0 – Request for Information (RFI):</b> Similar to BRIA, the ASETT architecture is built entirely on the Salesforce Cloud and comprised of three sections: Site, Community, and Platform. External users interface with the Community and Site section which are custom system pages developed using Visual Force and Apex to complete their necessary process actions and monitor complaint status. Administrators manage complaints via ASETT Platform access configured using Salesforce's native declarative development style. Community and Platform users gain access using enterprise-wide Identity Management Authentication with two factor authentication. Non-registered users (site users) require no authentication as they are only permitted to view public pages they submit. After submission, they cannot access the pages again.</p>			

#### Administrative Simplification Enforcement and Testing Tool (ASETT)

Similar to BRIA's requirement for interfacing with public for collecting comments, the ASETT system is a complaint intake system that is open to the public. The program's end users include our CMS NSG team who benefited from the workflow management. This includes built in reminders, notifications, and dashboards to help manage workloads and provides a centralized location where all documents related to the complaints are held.

#### 05/30/2023 – CMS ASETT

Contract Name	Contract Type	Customer Name	Customer POC	Contract Value	Period of Performance
Administrative Simplification Enforcement & Testing Tool (ASETT)	FFP	Centers for Medicare & Medicaid Services (CMS)	Gladys Wheeler, COR 410-786-0273 <a href="mailto:gladys.wheeler@cms.hhs.gov">gladys.wheeler@cms.hhs.gov</a>	\$15,095,536.6	06/01/19 - 05/31/24
<p>Brief Description of Services: RELI Group manages the full spectrum of business process and related compliance and security services for the Administrative Simplification Enforcement &amp; Testing Tool (ASETT) program. We support HIPAA complaint management and compliance reviews and identify opportunities for improvements and enhancements on ASETT. RELI also manages all associated security requirements and standards.</p>					
<p>Relevance to Capability Areas:</p> <p><i>Experience with HIPAA adopted standards for transactions and code sets, unique identifiers, and operating rules.</i></p> <p>As the current ASETT contractor, RELI Group has extensive knowledge of HIPAA standards and regulations. Our team supports CMS by providing administrative, analytical, and technical support for enforcement of the non-privacy and non-security provisions of HIPAA, ACA (Affordable Care Act), and other relevant regulations. ASETT is a web-based application which enables individuals or organizations to file a Health Insurance Portability and Accountability Act of 1996 (HIPAA) and/or Affordable Care Act (ACA) complaint against a HIPAA covered entity (which includes health care providers, health plans, and clearinghouses) for potential non-compliance with the non-Privacy/Security provisions of HIPAA. This includes Transactions and Code Sets, Unique Identifier, and Operating Rules provisions.</p> <p><i>Knowledge of HIPAA regulations</i></p> <p>RELI's ASETT team is staffed with multiple HIPAA Subject Matter Experts (SMEs) who each possess over 20 years of experience with policy requirements for each of the HIPAA and ACA regulations, specifically Transactions, Code Sets, ICD-10, NPI and HPID and others. The team consistently demonstrates advanced understanding of TR3 Report Implementation guides and technical specifications.</p> <p>Our SMEs use their extensive knowledge of HIPAA regulations to provide feedback that has enhanced the ASETT tool led to increased efficiency. For example, our team elected to switch from a free-form field to a dropdown field in Salesforce, which consisted of the most relevant HIPAA transactions. We discovered that with this change, users were able enter a complaint and respond to inquiries in a fraction of the time.</p> <p><i>Technical experience and capability to administer and maintain the CMS enforcement tool.</i></p> <p>RELI is the current system maintainer of the CMS enforcement tool. Our technical experience includes designing, testing, and implementing application enhancements. We also ensure the security of all enforcement data in accordance with CMS Privacy and Security requirements.</p> <p>Our team found that implementing Salesforce workflows in ASETT proved to be particularly helpful for users. The user feedback we gathered showed us that integrating Salesforce workflows allowed changes to be made quickly and efficiently, and led to increased consistency, increased efficiency, and less errors as each user followed the same processes. As a result of the workflows we built, we achieved automation that allowed users to receive direct system-generated email notifications when an action was required. This continuous feedback loop with the research</p>					

## Administrative Simplification Enforcement and Testing Tool (ASETT)

participants kept them engaged and allowed us to identify necessary changes to the frequency of the notifications. According to the feedback received from users during research engagements along the design process.

Using Salesforce dashboards and reporting features, our team was able to easily identify bottlenecks in processes. For example, our team recently documented a risk regarding the potential for DNS Enforcement Staff availability constraints which could introduce significant delays into the Enforcement process. We addressed this problem by providing potential solutions in a whitepaper that we submitted to CMS. CMS moved forward with our solution and the risk was mitigated. This resulted in expanding RELI's staff to support the Enforcement process.

One of our latest initiatives was aimed at reducing the number of invalid complaints filed in ASETT. This directly mapped to a CMS high priority to drive efficiency by reducing administrative burden. Resources would have more availability to address valid complaints if they did not have to sift through as many invalid complaints. Through conducting research and incorporating data provided by the Help Desk team, the team identified that users were selecting ASETT simply because it appeared on the top of the list when sorted in alphabetical order. Incorporating this feedback, our team focused on making strategic changes that could lead to the gradual reduction in invalid complaints and ensure that users were selecting ASETT for the appropriate functionality. We measured this using reports generated in ASETT that depicted a steady decline in invalid complaints over a 12-month period. To achieve this desired result, the team altered the user interface to rearrange and edit verbiage that would help the user determine when ASETT is not the appropriate place for their issue and provide guidance to users based on the most frequent invalid complaint subject matter.

*Technical expertise to maintain the operating and enhancement of a HIPAA transaction testing tool.*

Under the current ASETT program, RELI maintains the HIPAA Transaction Testing Tool and provide periodic enhancements to user availability and accessibility in collaboration with CMS. As new standards and requirements are implemented, ASETT also expands to account for the latest standards. RELI expands the use and accessibility of the Testing Tool for audit subject transaction testing by increasing functionality and implementing upgrades to test transactions.

*Experience with conducting HIPAA compliance audits*

Our team facilitates CMS' HIPAA compliance audits through the ASETT system. The Compliance Audit Program includes audits for HIPAA enforcement and compliance certification. Our ASETT team participates in the following enforcement audit processes for HIPAA compliance audit reviews:

- Participates in desk-review of audit subjects for HIPAA standards/Operating Rules/Standard Identifiers/Health Plan Certification compliance audits.
- Identifies entities for which a compliance review may be advisable on a mutually agreed upon schedule and number of candidates per year.
- Prepares necessary documentation to conduct a compliance audit.
- Adheres to compliance audit Policies and Procedures, particularly about communication and formal letters.
- Develops and implements reports for tracking certification compliance activity.

*Experience with assessing civil money penalties for non-compliance with HIPAA requirements.*

Under the ASETT Program, HIPAA-covered entities may be assessed civil money penalties (CMPs) for issues of noncompliance as defined in the enforcement rule. RELI has successfully evaluated issues of noncompliance and assessed situations that should deem a civil money penalty necessary or required. The penalty information is tracked in ASETT and coordinated with the Department of the Treasury for collection.

*Required Fed Ramp approval.*

Security is at the forefront of all changes we make to the ASETT tool. RELI manages the security program related to ASETT, which includes meeting all policies, standards, and procedures that govern the CMS Compliance Review Program and Complaint Enforcement. We ensure all changes do not compromise the integrity of the system and all data will continue to be adequately safeguarded. As part of our badge-less culture we promote, the Security team attends meetings and contributes new ideas and contributes to problem-solving.

The ASETT system is currently integrated with the CMS Salesforce Enterprise and is in production with Fed Ramp approval and an Authority to Operate (ATO). Our team has successfully collaborated with multiple contractors for maintenance and enhancements of the ASETT system that is integrated with the CMS enterprise-wide Shared Service applications such as Identity Management (IDM) and Salesforce Enterprise Integration (SEI).

*Experience with CMS Technical Review Board and CMS System Life Cycle requirements*

#### Administrative Simplification Enforcement and Testing Tool (ASETT)

Our ASETT team coordinates and implements system upgrades and enhancements to comply with CMS System Security requirements and Technical Review Board (TRB) recommendations. The modifications to the ASETT system would be made as requested and approved by CMS, with anticipated three (3) or more scheduled releases in a 12-month period.

##### *Experience with the Salesforce and Salesforce Lightning platform*

RELI maintains the ASETT system by managing the functionality, enhancing the system, and addressing inconsistencies or defects. Since ASETT is a Salesforce cloud product and is integrated with the CMS Salesforce Enterprise platform, RELI collaborates with the CMS Salesforce Enterprise to ensure that updates and enhancements are properly deployed.

On the ASETT program, our team has found that the Salesforce Lightning platform is a more modern and user-friendly interface than Salesforce Classic, allowing our team to be more efficient and productive in managing the functionality of the ASETT system. Additionally, our ASETT team uses the Salesforce platform to securely capture demographic information for the Compliance Reviews audits, complainants, and the filed-against-entity; details of the alleged violation; and any supporting documentation provided by the entity, complainant, and the filed-against entity. In addition, our team uses the Salesforce Agile Accelerator to manage Agile product development. The ASETT team currently tracks user stories, bugs, reports, and more from within Salesforce platform. As a result of feedback from users and SMEs, RELI makes recommendations for improvements on ASETT, develops a timeline for implementation, and submits to CMS for approval in accordance with our change management process. These recommendations are based on user feedback combined with an in-depth analysis of the current complaint management processes, procedures and the ASETT tool.

#### 05/16/2023- CDC DSLR Roadmap Implementation

Project Title	Customer Name	Customer POC	Total Contract Value
Administrative Simplification Enforcement & Testing Tool (ASETT)	Centers for Medicare & Medicaid Services (CMS)	Gladys Wheeler, COR 410-786-0273 <a href="mailto:gladys.wheeler@cms.hhs.gov">gladys.wheeler@cms.hhs.gov</a>	\$15,095,536.6
<p>Description of Services: The goal of the Administrative Simplification Enforcement &amp; Testing Tool (ASETT) project is to provide administrative, analytical, and technical support to the National Standards Group (NSG) within the Centers for Medicare &amp; Medicaid Services (CMS) for enforcement of the non-privacy and non-security provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Affordable Care Act (ACA), and other relevant regulations.</p> <p>RELI manages the full spectrum of business processes and related compliance and security services for the ASETT program. RELI provides HIPAA enforcement; recommends and implements Salesforce enhancements using Agile methodology; and modernizes the ASETT on the Salesforce cloud platform. RELI builds new modules to support the Compliance Review program and Industry Pilot and implementing system enhancements. We provide delivery planning and work with CMS to address new business requirements through enhancements to ASETT. As part of the planning process, we meet with CMS to collect enhancement requests. After collecting the requests, we create a backlog and prioritize future enhancements.</p> <p>We are now using the third generation of ASETT which was recently rebuilt using Salesforce and the legacy data was migrated to the new system. There was no downtime or data loss as part of this migration. At the time of the migration and transition, RELI focused on leveraging Salesforce's low code platform to drive an increase in efficiency. We established OKRs to align the work to strategic objectives and then measured the value we delivered toward those objectives through key results.</p> <p>The ASETT Salesforce system is currently integrated with the CMS Salesforce Enterprise and is in production with an Authority to Operate (ATO). Maintenance and enhancements of the ASETT system also involve integration with the CMS enterprise-wide Shared Service applications such as Identity Management (IDM) and Salesforce Enterprise Integration (SEI).</p>			

05/08/2023 – CMS EAOS – Phase One Response to Eligibility Appeals  
Operations Support (EAOS) - Digital Services Support (DSS)

1.1 CASE MANAGEMENT

Exhibit 3: Case Management Corporate Experience

CMS Administrative Simplification Enforcement and Testing Tool (ASETT)
RELI provides Salesforce case management customization, deployment, maintenance, and operational support for ASETT. RELI performs in-depth analysis of current complaint management processes, procedures, makes recommendations for improvements, and develops a timeline for implementation of those changes. <b>RELI identified opportunities for improvements and enhancements that increased staff efficiency and effectiveness in managing complaints and compliance reviews in a timely manner. We successfully implemented the case management framework</b> for our customers using thorough intake, assessment of process needs, service planning, monitoring, and evaluation of the end-to-end process. The HIPAA ASETT Salesforce system is currently integrated with CMS Salesforce Enterprise and is in production with an ATO. Maintenance and enhancements of the ASETT system also involve integration with the following CMS enterprise-wide Shared Service applications: Enterprise Identity Management, Enterprise Portal, Master Data Management, and Enterprise Salesforce. Additionally, the ASETT Salesforce application offers RELI the opportunity to evolve the Administrative Simplification program through expansion and modernization of the existing ASETT Web-based application. RELI works with CMS to address new business requirements through modernization and satisfy the objectives of meeting CMS TRA. We address compliance requirements for the CMS Enterprise and implement and customize key features such as multi-user access, workflow and scheduling capabilities, centralized database, data analysis tools and stringent security standards.

Exhibit 4: Configuring Low-Code or No-Code Platforms Corporate Experience

CMS Administrative Simplification Enforcement and Testing Tool (ASETT)
ASSET is a <b>Salesforce</b> application developed by RELI Group under the National Standards Group within CMS. RELI developed and implemented the system enhancements for ASETT on the <b>CMS-owned Salesforce cloud platform</b> , building new modules, providing operational support, and ensuring configuration management. RELI provides software support services including routine, emergency, and production maintenance and responds to special project and ad hoc requests. ASETT interfaces with CMS Identity Management through the Salesforce Enterprise Integration. This provides ASETT access to single sign-on capabilities, antivirus scanning tools for both uploaded and downloaded files, and more. For successful adoption of a low code platform that interfaces with multiple systems and has cross functional stakeholders, ensuring <b>standard platform governance processes are established and adhered to</b> is critical. RELI adheres to these processes, ensuring the <b>ASETT application remains in compliance with existing CMS regulations</b> , by collaborating with stakeholders and addressing issues such as accountability for user's security, data, and private information. <b>RELI manages Change Requests (CRs) to implement process improvements to ASETT</b> , conducts quarterly change management meetings, and maintains a change management log. CRs are reviewed with CMS, and the approved CRs are added to the product backlog in Salesforce. Our team uses Salesforce Change Sets for all deployments. Our releases are developed in a sandbox then tested in two additional sandboxes before implementation in the ASETT Production environment. This strategy was effectively used during the Salesforce migration from Government Cloud to Government Cloud Plus.

03/08/2023 – CMS EAOS

Exhibit 5: Case Management Corporate Experience

CMS Administrative Simplification Enforcement and Testing Tool (ASETT)
RELI provides Salesforce case management customization, deployment, maintenance, and operational support for ASETT. RELI performs in-depth analysis of current complaint management processes, procedures, makes recommendations for improvements, and develops a timeline for implementation of those changes. <b>RELI identified opportunities for improvements and enhancements that increased staff efficiency and effectiveness in managing complaints and compliance reviews in a timely manner. We successfully implemented the case management framework</b> for our customers using thorough intake, assessment of process needs, service planning, monitoring, and evaluation of the end-to-end process. The HIPAA ASETT Salesforce system is currently integrated with CMS Salesforce Enterprise and is in production with an ATO. Maintenance and enhancements of the ASETT system also involve integration with the following CMS enterprise-wide Shared Service applications: Enterprise Identity Management, Enterprise Portal, Master Data Management, and Enterprise Salesforce. Additionally, the ASETT Salesforce application offers RELI the opportunity to evolve the Administrative Simplification

Administrative Simplification Enforcement and Testing Tool (ASETT)

program through expansion and modernization of the existing ASETT Web-based application. RELI works with CMS to address new business requirements through modernization and satisfy the objectives of meeting CMS TRA. We address compliance requirements for the CMS Enterprise and implement and customize key features such as multi-user access, workflow and scheduling capabilities, centralized database, data analysis tools and stringent security standards.

Exhibit 6: Configuring Low-Code or No-Code Platforms Corporate Experience

CMS Administrative Simplification Enforcement and Testing Tool (ASETT)	
<p>ASETT is a <b>Salesforce</b> application developed by RELI Group under the National Standards Group within CMS. RELI developed and implemented the system enhancements for ASETT on the <b>CMS-owned Salesforce cloud platform</b>, building new modules, providing operational support, and ensuring configuration management. RELI provides software support services including routine, emergency, and production maintenance and responds to special project and ad hoc requests. ASETT interfaces with CMS Identity Management through the Salesforce Enterprise Integration. This provides ASETT access to single sign-on capabilities, antivirus scanning tools for both uploaded and downloaded files, and more.</p> <p>For successful adoption of a low code platform that interfaces with multiple systems and has cross functional stakeholders, ensuring <b>standard platform governance processes are established and adhered to</b> is critical. RELI adheres to these processes, ensuring the <b>ASETT application remains in compliance with existing CMS regulations</b>, by collaborating with stakeholders and addressing issues such as accountability for user's security, data, and private information.</p> <p><b>RELI manages Change Requests (CRs) to implement process improvements to ASETT</b>, conducts quarterly change management meetings, and maintains a change management log. CRs are reviewed with CMS, and the approved CRs are added to the product backlog in Salesforce. Our team uses Salesforce Change Sets for all deployments. Our releases are developed in a sandbox then tested in two additional sandboxes before implementation in the ASETT Production environment. This strategy was effectively used during the Salesforce migration from Government Cloud to Government Cloud Plus.</p>	

**Commented [LH1]:** This is wrong. Was developed by a third party under a previous contract.

10/19/2022 – CMS - Data Exchange 2.0 (DEX)

Administrative Simplification Enforcement and Testing Tool (ASETT)			
A. Client Organization Name and Point of Contact Information	Organization Name: Centers for Medicare & Medicaid Services (CMS)		
	POC Name: Gladys Wheeler; Email: Gladys.Wheeler@cms.hhs.gov; Phone: 410-786-0273		
B. Period of Performance	06/1/19 - 05/31/24		
C. Description of the Service Provider Team Competition & Roles			
Team Member / Role /Size	Principal Tasks	Team Composition	
RELI Group (Prime) – 8 FTEs	<ul style="list-style-type: none"><li>Program Management</li><li>Application Design</li><li>Change Management</li><li>Product Management</li><li>Customer Training</li><li>System Development Support and Maintenance</li><li>Systems Testing</li></ul>	<b>Key Resources:</b> <ul style="list-style-type: none"><li>Program Director (PD)</li><li>Business Analyst/ (BA)</li></ul>	<b>Other Labor Categories:</b> <ul style="list-style-type: none"><li>Scrum Master</li><li>Database Administrator/Salesforce Administrator</li><li>Security Specialist, Training Specialist</li></ul>
ActionNet (Subcontractor) – 4 FTEs	<ul style="list-style-type: none"><li>Tier 1 Help Desk support</li></ul>	<b>Key Resources:</b> <ul style="list-style-type: none"><li>Business Analysts</li><li>Salesforce Developer</li></ul>	
Cognosante (Subcontractor) – 1 FTE	<ul style="list-style-type: none"><li>Subject matter expertise in the relevant standards and regulatory requirements</li></ul>	<b>Key Resources:</b> <ul style="list-style-type: none"><li>Subject Matter Expert</li></ul>	

#### Administrative Simplification Enforcement and Testing Tool (ASETT)

Administrative Simplification Enforcement and Testing Tool (ASETT)	
<b>D. Explain whose experience is being quoted and the role of that firm or individual in performance of the work envisioned under this solicitation.</b>	
The corporate experience that is being quoted here refers to RELI Group, Inc., who is acting as the prime contractor for ASETT. RELI plans to execute all aspects of the contract, envisioned under this DEX solicitation, by itself, without any assistance from other subcontractors. RELI has access to several key personnel who would play a critical role on this contract.	
<b>E. Description of the project including goals, outcomes, descriptions of tasks performance &amp; experience gleaned from that performance, along with any other pertinent, retrospective information.</b>	
<p><b>Project Description:</b> RELI provides administrative, analytical, and technical support to the Office of Information Technology (OIT) within CMS for enforcement of the non-privacy and non-security provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Affordable Care Act (ACA), and other relevant regulations. We also manage and enhance the Administrative Simplification Enforcement and Testing Tool (ASETT) system. This includes administration, daily maintenance, and implementation of enhancements.</p> <p>Similar to CPI's efforts to detect and prevent healthcare provider fraud, waste, and abuse, ASETT's Compliance Review program enforces compliance with HIPAA Administrative Simplification rules for electronic health care transactions. Compliance with Administrative Simplification transaction standards reduces the administrative burden on the healthcare industry.</p> <p>RELI manages the compliance review process which includes training entities on how to use ASETT, assessing the entities' practices, and taking corrective action on entities, when necessary." Metrics and findings, including a list of common violations, are published internally on a monthly and quarterly basis for stakeholders and externally on the CMS website for industry awareness purposes.</p> <p><b>Tools, Technologies &amp; Cloud-based Architecture:</b> The ASETT architecture is built entirely on the Salesforce Cloud and comprised of three sections: Site, Community, and Platform. External users interface with the Community and Site section which are custom system pages developed using Visual Force and Apex to complete their necessary process actions and monitor complaint status. Administrators manage complaints via ASETT Platform access and will be configured using Salesforce's native declarative development style. Community and Platform</p>	<p><b>Notable Contract Highlights Relevant to DEX SOO</b></p> <ol style="list-style-type: none"><li>1 RELI successfully uses agile to maintain and update ASETT, an automated system for tracking, monitoring, and reporting compliance review activity.</li><li>2 ASETT's Compliance Review program successfully supports efforts to detect and prevent healthcare provider fraud, waste, and abuse and errors in Medicare and Medicaid health insurance programs.</li><li>3 Developed and implemented an effective program to provide training on an on-going basis.</li><li>4 Successful collaboration with multiple contractors for maintenance and enhancements of the ASETT system that is integrated with the CMS enterprise-wide Shared Service applications such as Identity Management (IDM) and Salesforce Enterprise Integration (SEI).</li></ol>



## Administrative Simplification Enforcement and Testing Tool (ASETT)

### Administrative Simplification Enforcement and Testing Tool (ASETT)

users gain access using enterprise-wide Identity Management Authentication with two factor authentication. Non-registered users (site users) require no authentication as they are only permitted to view public pages they submit. After submission, they cannot access the pages again.

**Stakeholder Engagement (clients, users, etc.):** Similar to DEX, frequent and close collaboration is essential on ASETT so that development can be quickly adjusted based on users' feedback. ASETT incorporates various techniques to provide seamless channels of communication between the team members building the product. For example, we use daily standup meetings to discuss the status of tasks and any impediments or bottlenecks. For items requiring longer discussion, we move those to an "after-party" discussion where we further collaborate and identify solutions. For items requiring even more collaboration, we schedule one to two hour working sessions. Finally, one of the most helpful methods of collaboration we use is a feature in Salesforce called Chatter. Salesforce Chatter is a real-time social collaboration application where project team members work together by talking and sharing information (*USDS Play # 1*).

**Goals:** The goal of the ASETT project is to provide administrative, analytical, and technical support to the National Standards Group (NSG) within CMS for enforcement of the non-privacy and non-security provisions of HIPAA, the ACA, and other relevant regulations.

**Outcomes:** RELI successfully maintains and administers ASETT and supports operations that include HIPAA enforcement for transactions, code sets, unique identifiers, and operating rules.

- RELI successfully maintains ASETT, performing software releases and providing operational support, meeting functional and system requirements, and ensuring configuration management.
- RELI's compliance review program has evolved the enforcement effort to be more proactive by performing compliance assessments on randomly selected entities.
- RELI successfully meets the service-level agreements (SLAs) of the contract, including quality standards for compliance review, documentation timelines, and reporting requirements, and ensures ASETT availability.

#### Descriptions of tasks performance & experience gleaned from that performance:

**Task 1 – Project Management (SOO 4.1):** For the DEX contract, Agile development is essential for features and functionality to be developed in an iterative manner (*USDS Play # 4*). The ASETT project management approach includes the project schedule and estimating metrics, the management control framework, and the quality and risk management approaches necessary to successfully execute this project.

**Task 2 – System Development (SOO 4.2):** RELI will leverage our experience on ASETT, recommending and implementing system (Salesforce) enhancements, modernizing ASETT on Salesforce cloud platform, and building new modules to support the compliance review program. As part of RELI's Salesforce Cloud platform experience on ASETT, the team re-designed the ASETT Java Enterprise Edition application to Salesforce; coded, tested, implemented, and maintained the ASETT Salesforce application; and configured the Salesforce implementation of ASETT to integrate with SEI. In fact, ASETT was the first CMS application to successfully integrate with SEI.

**Task 3 – Operations and Maintenance (SOO 4.3):** RELI will leverage our experience maintaining the ASETT Salesforce system and managing the functionality of ASETT via secure integration with the CMS Salesforce Enterprise platform. This work includes coordinating integration of the ASETT system with existing CMS systems to meet the CMS Enterprise-wide requirements;

#### Administrative Simplification Enforcement and Testing Tool (ASETT)

##### Administrative Simplification Enforcement and Testing Tool (ASETT)

monitoring the status of system availability and meeting SLAs; and designing, testing, and implementing application enhancements.

**Task 4 – Scheduled Releases and Enhancements (SOO 4.4):** RELI maintains the ASETT system by managing the functionality, enhancing the system, and addressing inconsistencies or defects. Since ASETT is a Salesforce cloud product and is integrated with the CMS Salesforce Enterprise platform, RELI collaborates with the CMS Salesforce Enterprise to ensure that updates and enhancements are properly deployed. In addition to designing, testing, and implementing system changes, the team updates and publishes all related system documents.

**Task 5 – Hosting, Licensing & Development (SOO 4.5):** ASETT is a Salesforce cloud application. CMS assumes all licensing costs on this project under the CMS Blanket Purchase Agreement (BPA) for all CMS Salesforce government organizations.

**Task 6 – Transition (SOO 4.6):** When originally awarded in 2019, RELI successfully transitioned the existing ASETT Salesforce system from the incumbent contractor by setting up a training schedule and a schedule of events which were conducted over a 3-month period. Transition concluded sooner than originally planned because RELI was able to leverage past key resources who previously supported ASETT and had strong knowledge and key experience which allowed for a seamless transition. RELI maintained communication, coordination, and consultation with the incumbent to support the transition and ongoing work and would do the same with a DEX transition. The team held regular meetings and frequently reported to CMS the status of transition activities via the use of status reports and status meetings.

**Other pertinent, retrospective information:** RELI works hard to understand what our stakeholders need. As part of the planning process, we conduct interviews with end users to identify areas of improvement. After collecting the requests, findings are captured in the form of user stories on the product backlog for future prioritization. User stories are created in Agile Accelerator, a Salesforce tool. As a result of feedback from users and SMEs, RELI makes recommendations for improvements on ASETT, develops a timeline for implementation, and submits to CMS for approval in accordance with our change management process. These recommendations are based on user feedback combined with an in-depth analysis of the current complaint management processes, procedures, and the ASETT tool. RELI also identifies opportunities for improvements and enhancements that will reduce reporting burdens associated with filing and managing complaints and conducting compliance reviews (*USDS Play # 2*).

In response to the request from CMS for the ASETT project to provide a training program, RELI developed and implemented a program to provide training on an on-going basis. The training encompasses each area of Enforcement as well as HIPAA Complaint management and processing according to the CMS approved Standard Operating Procedures (SOP). This program, led by our Lead Trainer who has over 20 years of experience and holds various certifications such as Certified Professional of Talent Development (CPTD), has been operating successfully with participants reporting how pleased they are with the information and delivery. RELI supports all ASETT users by providing detailed user manuals and guides, in addition to a Tier 1 help desk. The help desk is accessible through a phone line and email box. Complex matters are elevated to Tiers 2 and 3 help desks through IDM or Salesforce. On a weekly basis, metrics related to ticket volume and type, are analyzed and reviewed with the CMS client team. This helps the team identify pain points and document potential enhancements to the ASETT system.

#### Administrative Simplification Enforcement and Testing Tool (ASETT)

Administrative Simplification Enforcement and Testing Tool (ASETT)	
Experience Gleaned from ASETT for each of the Major Tasks in DEX	
DEX Major Tasks	How ASETT experience aligns to Objectives for DEX
Task 1 – Project Management (SOO 4.1)	Agile delivery, coordination with CMS and other CMS contractors, standards and technology policy compliance, contractual financial reporting
Task 2 – System Development (SOO 4.2)	User experience enhanced through prototyping, innovative product development, adherence to CMS XLC model, cloud-based platform
Task 3 – Operations and Maintenance (SOO 4.3)	Collaborative environment, change control, reporting, user support and enhancing user experience
Task 4 – Scheduled Releases and Enhancements (SOO 4.4)	Biweekly releases, frequent enhancements, scheduled maintenance
Task 5 – Hosting, Licensing & Development (SOO 4.5)	Cloud hosting
Task 6 – Transition (SOO 4.6)	Adherence to a transition plan

#### 08/20/2021 - NIH Acquisition and Assessment Center (NITAAC) - Chief Information Officer – Solutions and Partners 4 (CIO-SP4)

##### Administrative Simplification Enforcement and Testing Tool (ASETT)

###### 2.1 Summary of the Project

RELI is managing the full spectrum of business process and related compliance and security services for the Administrative Simplification Enforcement & Testing Tool (ASETT) program. As prime, RELI provides project management to meet the technical requirements and performance standards. We perform HIPAA complaint management and compliance reviews for the ASETT contract, and we identify opportunities for improvements and enhancements.

Contract Type: Firm Fixed Price (FFP)

Dollar Value: \$13,118,229.51

Period of Performance: 06/2019 – 05/2024

###### 2.2 SOW Task Area(s) Closely Align with the Type of Work that was Performed

Task Area(s) 1, 2, 5, 9, and 10.

**Task Area 1:** RELI is managing the full spectrum of business process and related compliance and security services for the ASETT program. Initially designed as a complaint intake system, the legacy ASETT system has been redesigned twice and recently moved to the Salesforce platform. With this modernization effort, ASETT was expanded and enhanced to support additional capability, including administrative functions to support CMS' new Compliance Review program. ASETT assists with facilitating the exchange of data and statistics related to HIPAA Administrative Simplification enforcement.

## Administrative Simplification Enforcement and Testing Tool (ASETT)

**Task Area 2:** RELI Group provides Project Management Support, specifically Agile Project Management, to the National Standards Group (NSG) within CMS. Our team manages the contract through completion to ensure proper and timely implementation of technical and/or business solutions, schedules, objectives, budgets, and milestones. This includes applying domain expertise to business problems, developing and defining strategic visions, providing client representation, and support.

**Task Area 5:** RELI Group performs operations and maintenance on the ASETT system to keep the system functioning optimally and up to date with the most recent versions of the software used to provide key functionality of the system. We coordinate with third party vendors to ensure the latest upgrades are available to the ASETT end user community. For IT Service Management, we ensure we have the appropriate mix of people, processes and technology to provide value to CMS. RELI manages communications with the public and other external stakeholders of the ASETT system through various methods, including fielding telephone calls received by the ASETT Helpdesk line. The ASETT testing specialist provides training to new team members. The training includes what their roles will be, how they can use ASETT, and what ASETT will do or will not do.

**Task Area 9:** In supporting business process and related compliance and security services for the ASETT program, RELI provides HIPAA enforcement, recommends and implements system (Salesforce) enhancements using agile methodology, and modernizes ASETT on the Salesforce cloud platform. RELI builds new modules to support the Compliance Review program and Industry Pilot and implementing system enhancements. We provide delivery planning and work with CMS to address new business requirements through enhancements to ASETT. As part of the planning process, we meet with CMS to collect enhancement requests. After collecting the requests, we create a backlog and prioritize future enhancements.

**Task Area 10:** RELI's experienced ASETT program team manages and executes the program with an optimum balance between governance and Agile testing solutions covering the full spectrum of the ASETT program. As part of the planning process, we meet with CMS to collect enhancement requests. After collecting the requests, we create a backlog and prioritize future enhancements in backlog grooming sessions with the relevant stakeholders such as client team, project team, Scrum Master, and Product Owner. The requirements for ASETT are maintained using a Requirements Document and user stories created in Agile Accelerator, a Salesforce tool. Additional requirements are gathered in various meetings and through mockups of requests from stakeholders. RELI also manages all associated security requirements and standards.

## 07/31/2020 – CMS ECR

Customer (Agency)	Contract #	POC	Total Contract Value	Period of Performance	Description of Services/Supplies	Relevant (Y/N)	Additional Info
CMS	SPARC IDIQ Contract No.: HHSM5002017000451  Task Order #: 75FCMC19F0001	Name: Adam Forgione, CO Phone: 410-786-8354 Email: adam.forgione@cms.hhs.gov	\$11,150,468.66	Base: 06/1/2019–05/31/2020  OY 1: 06/1/2020–05/31/2021  OY 2: 06/1/2021–05/31/2022  OY 3: 06/1/2022–05/31/2023	<b>Administrative Simplification Enforcement &amp; Testing Tool (ASETT)</b>  See below.	Yes (see below).	RELI has CPARs available for this project.

#### Administrative Simplification Enforcement and Testing Tool (ASETT)

				OY 4: 06/1/2023– 05/31/2024			
<i>Description of Services/Supplies:</i> RELI is managing the full spectrum of business process and related compliance and security services for the Administrative Simplification Enforcement & Testing Tool (ASETT) program. Initially designed as a complaint intake system, the ASETT system has been moved to the Salesforce platform and expanded and enhanced to manage additional functions, including monitoring covered entities' compliance with HIPAA standards for Administrative Simplification. RELI also manages all associated security requirements and standards.							

#### 07/24/2020 – CMS - Compliance Support for Multiple Models

Callout:

##### Administrative Simplification Enforcement & Testing Tool (ASETT) Contract

RELI manages business processes and related compliance and security services for the ASETT program initially designed as a complaint intake system. RELI also manages associated security requirements and standards. Other services include:

- Providing HIPAA enforcement as it relates to reactive complaint management and proactive compliance audits for the transactions, code sets, unique identifiers, and operating rules.
- Recommending and implementing Salesforce enhancements using agile methodology.
- Modernizing ASETT on the Salesforce cloud platform, building new modules to support the Compliance Review program and Industry Pilot, and continuing to implement system enhancements in ASETT.

#### 06/03/2020 – CMS NPPES

Customer (Agency)	Contract #	POC	Total Contract Value	Period of Performance	Description of Services/ Supplies	Relevant (Y/N)	Additional Info
CMS	SPARC IDIQ Contract No.: HHSM500201 700045I  Task Order #: 75FCMC19F00 01	Name: Adam Forgione, CO Phone: 410-786-8354 Email: adam.forgione@cms. hhs.gov	\$11,150, 468.66	Base: 06/1/20 19– 05/31/2 020  OY 1: 06/1/20 20– 05/31/2 021  OY 2: 06/1/20 21–	<b>Administrative Simplification Enforcement &amp; Testing Tool (ASETT)</b>  Please see below.	Yes (see below).	N/A

### Administrative Simplification Enforcement and Testing Tool (ASETT)

				05/31/2022		
				OY 3: 06/1/2022– 05/31/2023		
				OY 4: 06/1/2023– 05/31/2024		
<b>Description of Services/ Supplies:</b> RELI is managing the full spectrum of business processes and related compliance and security services for the Administrative Simplification Enforcement & Testing Tool (ASETT) program.						
<b>Relevance:</b> <i>Relevance to SOW Task 1</i> – As prime, RELI provides project management, business process, and related compliance and security services for the ASETT program. <i>Relevance to SOW Task 2</i> – RELI provides operations, maintenance, and enhancement support, including releases for system improvement/enhancement, direct O&M, and system administration. <i>Relevance to SOW Task 6</i> – RELI provides services related to improving the user experience as well as access controls and access management of the system.						