

MES Standard Operating Procedures (SOPs)

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Medicaid Enterprise Systems Standard Operating Procedures (SOPs)

Medicaid Enterprise Systems Mailbox and Workflow

This SOP provides steps that the CMS Operations Team take when a State submits an APD, contract, Request for Proposal (RFP). This demonstrates how the Ops Team mailbox administrator moves a submission from the MES mailbox and creates a decision package in the MES Unified Workflow. Unless otherwise specified, all references to days or period of days are calendar days.

Step	Timeframe	Action	Person(s) Responsible	Authority/Citation / Purpose
1	Day 1 (State Submission)	<p>1. States must formally submit all submissions for review, with cover letter, based on the program area of the submission, to one of the following MES mailboxes:</p> <p>MedicaidMMIS@cms.hhs.gov MedicaidE&E_APD@cms.hhs.gov</p> <p>2. State copies MES State Officer in a formal submission email.</p> <p>*Please note: The mailbox is used for only formal new submissions. (RAI responses or <u>additional</u> information for a formal submission from the state should be sent directly to the Director and MES State Officer)</p>	State	45 CFR 95.610 Submission of advance planning documents.
2	Day 1 (MES Mailbox)	<p>The CMS mailbox administrator reviews the submission to identify if it should be added to the CMS workflow. Once identified, the mailbox administrator categorizes the email with the following label:</p> <p>Checked & tracked in the Unified Workflow</p> <p>The labeled submission is then placed in the corresponding Mailbox State folder for tracking and auditing purposes.</p>	Ops Team	Tracking and auditing purposes.
3	Day 1 (Workflow)	<p>Once the mailbox triage process is complete, the mailbox administrator creates a MES Decision Package in the Unified Workflow. In the Decision Package the administrator fills in the following items:</p> <ol style="list-style-type: none"> 1. Name – [State]-[YYYY-MM-DD]-[Funding Type]- Submission Type]-[Project Name] 	Ops Team	CFR 45§ 95.611

		<p>If opdiv: [State]-[YYYY-MM-DD]-[Funding Type]-[Opdiv]-[Submission Type]-[Project Name]</p> <p>*The date in the naming convention reflects the date the submission was submitted to CMS.</p> <ol style="list-style-type: none"> 1. Acknowledgement Date – starts the 60-day clock. 2. State 3. Submission Type (APD, Contract...) 4. Funding Type (MMIS, EE, HITECH, MMIS/EE) <p>Once all items are filled in, the administrator clicks save and this completes the creation of the Decision Package.</p> <p>Acknowledgement Email</p> <ol style="list-style-type: none"> 1. The mailbox administrator will send the acknowledgement email back to the state and cc the State Officer. 2. Add the acknowledgement email to the decision package. 3. Mark the submission as tracked, and acknowledgment sent in the appropriate mailbox. <p>Status Memo</p> <ol style="list-style-type: none"> 1. The mailbox administrator will add the date the submission was received and the date the acknowledgement letter was sent to the state in the status memo field 		Communicate status of the submission.
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Medicaid Enterprise Systems (MES) APD and Prior Approval Review

This SOP applies to E&E and MMIS APDs that are approved within DSS. Responsibility for ensuring that reviews of APD related documents are completed according to CMCS policy lies with the State Officer as state lead with oversight of the APD project and costs related to state's MES system development. Unless otherwise specified, all references to days or period of days are calendar days.

Step	Timeframe	Action	Person(s) Responsible	Authority/Citation
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1	Day 1 (State Submission)	<ol style="list-style-type: none"> 1. States must formally submit all APDs, with cover letter, based on the program area of the submission, the following MES mailboxes: MedicaidMMIS@cms.hhs.gov MedicaidE&E_APD@cms.hhs.gov 2. State copies MES State Officer (SO) in formal submission email. <p>The formal submission, by the state, initiates this SOP. Use of the phrase "APD" hereafter refers to PAPD, IAPD, IAPD-U, OAPD, and OAPD-U, submitted by states</p>	State	45 CFR 95.610 and 45 CFR 95.611 SMD Letters 16-004 and 16-009
2	(Workflow Notification)	<p>The mailbox administrator creates a MES Decision Package in the Unified Workflow. In the Decision Package the administrator fills in the following items:</p> <ol style="list-style-type: none"> 2. Name – [State]-[YYYY-MM-DD]-[Funding Type]- Submission Type]-[Project Name] <p>If opdiv: [State]-[YYYY-MM-DD]-[Funding Type]-[Opdiv]-[Submission Type]-[Project Name]</p> <p>*The date in the naming convention reflects the date the state submitted to the mailbox.</p> <ol style="list-style-type: none"> 2. Acknowledgment Date 3. State 4. Submission Type (APD, Contract...) 5. Funding Type (MMIS/EE/HITECH) <p>Once all items are filled in, the administrator clicks save and this completes the creation of the Decision Package.</p> <p>Acknowledgement Email</p> <ol style="list-style-type: none"> 1. The mailbox administrator will send the acknowledgement email back to the state and cc the State Officer. 2. Add the acknowledgement email to the decision package. 3. Mark the submission as tracked, and acknowledgment sent in the appropriate mailbox. <p>Status Memo</p>	Ops Team	CFR 45§ 95.611

		2. The mailbox administrator will add the date the submission was received and the date the acknowledgement letter was sent to the state in the status memo field		Tracking and auditing purposes.
3	Day 3 (UWF Document Decision Set upload)	<p>1. SO reviews the Decision Package and determines if the naming convention fits the state submission. SO can make corrections if the naming convention or any other information is not accurately reflected. (For instance, does the naming convention include the correct project name) This must be updated before sending to FM for review.</p> <p>The SO will also verify:</p> <ol style="list-style-type: none"> 1. Funding Type: Verify the funding type has been selected appropriately. (If this is a MMIS and HITECH funding request, then the MMIS/HITECH selection should be made.) 2. OpDiv: Verify if the submission is a joint project, if so selects the appropriate Multi-Program Agency: FNS or HHS 3. Funding Requested: Verify the requested amount and input the total amount requested for the APD or contract. 4. Vendor: Not required for APD submissions 5. Executive Summary: The SO should have the executive summary section complete with a concise paragraph about the submission that includes a summary of the scope and recommended action(s). 	MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.
4	(Request for cross-functional review)	<p>Forwards the APD to cross-functional team members for review and comment, as applicable, based on project type.</p> <p>Cross-functional team initial feedback is requested within 7-10 business days from the date of the SO request; Cross-functional comments are reviewed for inclusion in SO comments to the state and/or consideration in SO final recommendation for Division leadership.</p>	MES State Officer	Compliance with MES internal process.

5	Day 15 (Initial review)	<p>Receives and compiles written comments from the Cross-functional team and determines if there are questions or concerns with the submitted APD.</p> <p>Any initial comments are issued to the state via email, requiring the state to respond to the concern and/or submit an updated version of the APD.</p> <p>Email correspondence is uploaded in the UWF decision package and status memo is updated with date of the correspondence.</p> <p>If there are no issues, the SO documents in the status memo that no initial issues exist and initiates the detailed review.</p>	MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.
6	Day 30 (Detailed review completion)	<p>Detailed review of the APD is completed per the APD Review Guidelines (SMDL 16-004: APD Requirements). Review will include at a high level, ensuring the scope, schedule, and budget adhere to and are compliant with federal regulations, and that reimbursable activities are identified and categorized according to outlined in the CMS internal reimbursable activities chart.</p> <ol style="list-style-type: none"> 1. The APD must be complete (all sections of the APD Template filled out) and contain updated information from any previous submission. 2. During review of the APD, the scope identified within the executive summary must match the needs and objectives. Importantly, the executive summary should identify the grand total of funding included in the request. 3. If new DDI is being requested, a statement of alternative considerations must be completed, showing that the state has justified the proposed approach. 4. The personnel and contractor resources section must include state and contractor staff descriptions that align with the scope described in the Needs and Objectives section. This section must provide a total dollar amount, including FFP requested, for state and contractor costs. All proposed and active contracts must be outlined. 5. The Activity Schedule must be updated to reflect both completed and new activity, and should align 	MES State Officer	<p>45 CFR 95.610 and 45 CFR 95.611</p> <p>SMD Letters 16-004 and 16-009</p>

		<p>with the scope as described in the Needs and Objectives section.</p> <p>6. The Proposed Budget Section should be completed, compute correctly, and include the personnel costs. Importantly, this section should also contain non-personnel costs, as well as a quarterly breakout of the requested funding.</p> <p>7. The cost allocation should include all costs identified in the Proposed Budget, inclusive of any other funding source. A detailed description of the state's methodology and subsequent calculation for determining cost share, must be included.</p> <p>8. The assurances need to be completed with explanations and assurances for compliance with each section.</p> <p>Note: All appendices must be included, even if an Appendix is not applicable to the state.</p> <p>Review of state response to any comments issued previously is completed, including review by cross-functional team, if applicable.</p> <p>If detailed Review is completed by this time and all comments resolved, the SO documents in the status memo the completion of the detailed review and when the decision package is submitted into clearance. The decision package is finalized and submitted into clearance via the UWF SOP.</p> <p>Any remaining comments are documented and issued to the state. The SO documents these in the status memo. If it is anticipated, through communication with the state, that comments issued will <u>NOT</u> be resolved prior to Day 44, a Request for Additional Information (RAI) is initiated.</p>		
	*If RAI is initiated	RAI Section		45 CFR 95.611(d)
	*Withdrawal	<p>If the State wants to withdraw a submission from CMS review, the state will provide the MES State Officer with an email requesting that the submission be withdrawn. The State Officer will upload this email request into the Unified Workflow and close out the decision package by clicking on 'Submission Withdrawn by State' action.</p>	State / MES State Officer	

7	<p>By Day 44</p> <p>(Preparing a decision package for clearance)</p>	<p>The State Officer will draft an approval letter using the appropriate APD approval letter template. The approval letter must match the naming convention as the decision package.</p> <p>When a Decision Package is ready for the Clearance process for an approval or RAI action, the following items should be included/upload to the workflow:</p> <ol style="list-style-type: none"> 1. Project/Consolidated MDBT (If emailed from the state, the email should be uploaded.) 2. Final draft CMS approval letter 3. APD (If emailed from the state, the email should be uploaded.) 4. MES Clearance Checklist should be completed with comments included to help with FM review, then uploaded. 5. Any email correspondence between SO, State, Cross Functional Teams, and Leadership. <p>Team Lead QC</p> <ol style="list-style-type: none"> 1. The SO will reach out to their team lead when their approval letter is ready for review. 2. The team lead will simultaneously review the letter, provide feedback, and fill out the quality check workbook. 3. When the team lead is finished, they will note in the status memo that they reviewed and will let the SO know the review is complete. 4. The SO will review the recommended feedback, make any necessary adjustments, and submit the letter into clearance. <p>SO documents in the status memo when the package is submitted into clearance and submits package for clearance via UWF Notification email. This moves the package to Deputy Director for review.</p> <p>If the letter reflects multiple submissions, each workflow should include</p> <ol style="list-style-type: none"> 5. the parent/child relationship noted in the executive summary 6. documentation in ALL the workflows that are included in parent/child approvals (parent/child) (Ex – Checklist for each Ind. Submission, draft approval letter, final signed 	MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.
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		<p>approval letter and email to state with signed approval letter...)</p> <p>However, only the parent workflow for the first action should be submitted for clearance – once the letter has been signed, the SO should return to the workflows for the additional actions and use the ‘Cleared as part of a parent decision package’ to move them forward.</p> <p>If disapproved, initiate disapproval action</p> <ol style="list-style-type: none"> 1. SO drafts disapproval letter using the disapproval letter template and uploads to Workflow 2. Decision package status memo and executive summary is updated, indicating the reason for disapproval. 3. SO moves Workflow through clearance by choosing “approval” (approval for the disapproval letter) 4. After director signature of disapproval letter - Final disapproval letter issued to the State and cc’d list. 5. SO uploads disapproval letter and email to state to the Workflow, updates status memo field with disapproval date and closes out Workflow. 		
8	<p>Day 45 - 49 (Workflow: Clearance – Deputy Director Review /FM Review)</p>	<p>Deputy Director reviews as the first level supervisor. Deputy Director reviews the approval letter and ensures SO has all supporting documentation included in the Decision Package. If not, Deputy Director will either follow up and/or send the workflow back to the SO for additional information</p> <p>Once Deputy Director approves, they move the decision package along to the FM team.</p> <p>The FM team reviews the submission to ensure financial accuracy to make sure the approval letter’s MDBT aligns with previously approved and newly requested funding based on the National MDBT and MBES most recent allotment amounts.</p> <p>FM reviews Ops Checklist, adds comments as needed, and ensures SO has all supporting documentation included in the Decision Package. If not, FM will</p>	Deputy Director FM	Ensure decision package is complete and ready to move forward through the approval workflow.

		<p>either follow up and/or send the workflow back to the SO for additional information.</p> <p>Once FM approves, they mark the approval letter as final and moves the decision package along to the Director.</p>		
	Day 50 (Workflow: Clearance – Deputy Review)	<p>The Workflow will forward the decision package to the to the Division Director for signature to indicate final approval.</p> <p>When the Approval Letter is signed, the SO will be notified by email from the Workflow. The SO is responsible for sending the signed Approval Letter to the state and use the MESClearance email (MESClearance@cms.hhs.gov) and copy any other FMG and state folks in the approval letter within one business day. The SO also uploads the signed Approval Letter and email sent to the state to the UWF, and documents these actions in the status memo. SO will close out the final task via the Approved email sent by the workflow within one business day.</p> <p>Note: This package should not be marked completed until SO closes out the final task via the Approved Email from the workflow.</p>	Director MES State Officer	Maintain accurate data about the submission.
	Update Project Health in State Portfolio	<p>Once the APD is approved the State Officer is responsible for updating the project health in SharePoint.</p>	State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.

Request for Proposal (RFP)

This SOP applies to RFPs that are approved within DSS. Unless otherwise specified, all references to days or period of days are calendar days.

Step	Timeframe	Action	Person(s) Responsible	Authority/Citation
1	Day 1 (State Submission)	<p>1. States must formally submit all RFP documents, with cover letter, based on the program area of the submission, the following MES mailboxes:</p> <p>MedicaidMMIS@cms.hhs.gov MedicaidE&E APD@cms.hhs.gov</p> <p>2. State copies MES State Officer (SO) in formal submission email.</p>	State	45 CFR 95.611 (b)(2)(iii) for enhanced FFP, with caveats as described in (e)
2	(Workflow Notification)	<p>The mailbox administrator creates a MES Decision Package in the Unified Workflow. In the Decision Package the administrator fills in the following items:</p> <p>1. Name – [State]-[YYYY-MM-DD]-[Funding Type]- Submission Type]-[Project Name]</p> <p>If opdiv: [State]-[YYYY-MM-DD]-[Funding Type]-[Opdiv]-[Submission Type]-[Project Name]</p> <p>*The date in the naming convention reflects the date the state submitted to the mailbox.</p> <p>2. Acknowledgment Date</p> <p>3. State</p> <p>4. Submission Type (APD, Contract...)</p> <p>5. Funding Type (MMIS/EE/HITECH)</p> <p>Once all items are filled in, the administrator clicks save and this completes the creation of the Decision Package.</p> <p>Acknowledgement Email</p> <p>1. The mailbox administrator will send the acknowledgement email</p>	Ops Team	<p>CFR 45§ 95.611</p> <p>Tracking and auditing purposes.</p>

		<p>back to the state and cc the State Officer.</p> <ol style="list-style-type: none"> Add the acknowledgement email to the decision package. Mark the submission as tracked, and acknowledgment sent in the appropriate mailbox. <p>Status Memo</p> <ol style="list-style-type: none"> The mailbox administrator will add the date the submission was received and the date the acknowledgement letter was sent to the state in the status memo field <p>The SO receives an email from the Unified Workflow (UWF) @ (cmsinsight@cms.hhs.gov) with notification of the received submission and associated UWF ID.</p>		
3	<p>Day 3</p> <p>(UWF Document Decision Set upload)</p>	<ol style="list-style-type: none"> SO reviews the Decision Package and determines if the naming convention fits the state submission. SO can make corrections if the naming convention or any other information is not accurately reflected. (For instance, does the naming convention include the correct project name) This must be updated before sending to FM for review. <p>The SO will also do the following:</p> <ol style="list-style-type: none"> Funding Type: Verify the funding type has been selected appropriately. (If this is a MMIS and HITECH funding request, then the MMIS/HITECH selection should be made.) OpDiv: Verify if the submission is a joint project, if so selects the appropriate Multi-Program Agency: FNS or HHS 	MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.

		<p>3. Funding Requested: Input the total anticipated cost if provided by the state with the RFP.</p> <p>4. Executive Summary: The SO should have the executive summary section complete with a concise paragraph about the submission that includes a summary of the scope and recommended action(s).</p>		
5	Day 15 (Initial review)	<p>Determines if there are any significant upfront questions or concerns with the submitted RFP.</p> <p>Any initial comments are issued to the state via email, requiring the state to respond to the concern and/or submit an updated version of the RFP.</p> <p>Email correspondence is uploaded in the UWF decision package and status memo is updated with date of the correspondence.</p> <p>If there are no issues, the SO documents in the status memo that no initial issues exist, and initiates the detailed review.</p>	MES State Officer	
6	Day 30 (Detailed review completion)	<p>The State officer will:</p> <ol style="list-style-type: none"> 1. Review the project scope 2. Review anticipated cost, if specified 3. Review supporting documents submitted 4. Confirm that funding for the work has been approved via APD. If the state identified a specific anticipated cost with the RFP, ensure consistency with the APD's budgeted amount. <p>If any of the above sections are incomplete or is lacking sufficient detail/clarity, the SO will submit comments/questions to the state, requiring the state to respond to the request for additional information and/or submit an updated version of the RFP.</p>	MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.

		Any remaining comments are documented and issued to the state. The SO documents these in the status memo. If it is anticipated, through communication with the state, that comments issued will <u>NOT</u> be resolved prior to Day 44, a Request for Additional Information (RAI) is initiated.		
	*If RAI is initiated	RAI Process		
	*Withdrawal	If the State wants to withdraw a submission from CMS review, the state will provide the MES State Officer with an email requesting that the submission be withdrawn. The State Officer will upload this email request into the Unified Workflow and close out the decision package by clicking on 'Submission Withdrawn by State' action.		
7	By Day 44 (Preparing a decision package for TL QC and clearance)	<p>The State Officer will draft an approval letter using the RFP approval letter template.</p> <p>When a Decision Package is ready for the Clearance process for an approval or RAI action, the following items should be included/upload to the workflow:</p> <ol style="list-style-type: none"> 1. Final draft CMS approval letter 2. Initial RFP submission e-mail from the state. 3. CMS acknowledgment e-mail. 4. MES Clearance Checklist should be completed with comments included to help with FM review, then uploaded. 5. Any email correspondence between SO, State, Cross Functional Teams, and Leadership. <p>Team Lead QC</p> <ol style="list-style-type: none"> 1. The SO will reach out to their team lead when their approval letter is ready for review. 2. The team lead will simultaneously review the letter, provide feedback, and fill out the quality check workbook. 	MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.

		<ol style="list-style-type: none"> 3. When the team lead is finished, they will note in the status memo that they reviewed and will let the SO know the review is complete. 4. The SO will review the recommended feedback, make any necessary adjustments, and submit the letter into clearance. <p>SO documents in the status memo when the package is submitted into clearance and submits package for clearance via UWF Notification email. This moves the package to Deputy Director for review.</p> <p>If the letter reflects multiple submissions, each workflow should include</p> <ul style="list-style-type: none"> • the parent/child relationship noted in the executive summary • documentation in ALL the workflows that are included in parent/child approvals (parent/child) (Ex – Checklist for each Ind. Submission, draft approval letter, final signed approval letter and email to state with signed approval letter...) <p>However, only the parent workflow for the first action should be submitted for clearance – once the letter has been signed, the SO should return to the workflows for the additional actions and use the 'Cleared as part of a parent decision package' to move them forward.</p> <p>If disapproved, initiate disapproval action</p> <ol style="list-style-type: none"> 1. SO drafts disapproval letter using the disapproval letter template and uploads to Workflow 2. Decision package status memo and executive summary is updated, indicating the reason for disapproval. 		
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		<ol style="list-style-type: none"> 3. SO moves Workflow through clearance by choosing “approval” (approval for the disapproval letter) 4. After director signature of disapproval letter - Final disapproval letter issued to the State and cc’d list. 5. SO uploads disapproval letter and email to state to the Workflow, updates status memo field with disapproval date and closes out Workflow. 		
	Day 45 – 49 (Workflow: Clearance – Deputy Director Review /FM Review)	<p>Deputy Director reviews as the first line supervisor. Ensures SO has all supporting documentation included in the Decision Package. If not, Deputy Director will either follow up and/or send the workflow back to the SO for additional information</p> <p>Once Deputy Director approves, they move the decision package along to the FM team.</p> <p>The FM team reviews the submission to ensure financial accuracy to make sure the approval letter’s MDBT aligns with previously approved and newly requested funding based on the National MDBT and MBES most recent allotment amounts.</p> <p>FM reviews Ops Checklist, adds comments as needed, and ensures SO has all supporting documentation included in the Decision Package. If not, FM will either follow up and/or send the workflow back to the SO for additional information.</p> <p>Once FM approves, they mark the approval letter as final and moves the decision package along to the Director.</p>	Deputy Director FM	Ensure decision package is complete and ready to move forward through the approval workflow.
8	Day 50 (Workflow: Clearance – Director Review)	<p>The Workflow will forward the decision package to the Division Director for signature to indicate final approval.</p> <p>When the Approval Letter is signed, the SO will be notified by email from the Workflow. The SO is responsible for sending the signed Approval Letter to the</p>	Director MES State Officer	Maintain accurate data about the submission.

		<p>state and use the MESClearance email (MESClearance@cms.hhs.gov) and copy any other FMG and state folks in the approval letter within one business day. The SO also uploads the signed Approval Letter and email sent to the state to the UWF and documents these actions in the status memo. SO will close out the final task via the Approved email sent by the workflow within one business day.</p> <p>Note: This package should not be marked completed until SO closes out the final task via the Approved Email from the workflow.</p>		
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Contracts and Contract Amendments

This SOP applies to Contracts and Contract Amendments that are approved within DSS. Unless otherwise specified, all references to days or period of days are calendar days.

Step	Timeframe	Action	Person(s) Responsible	Authority/Citation
1	Day 1 (State Submission)	<p>6. For contracts supported by enhanced FFP and anticipated to exceed \$500,000, and for contract amendments supported by enhanced FFP and involving contract cost increases exceeding \$500,000 or contract time extensions of more than 60 days, States must obtain CMS approval of such contracts and amendments prior to execution. States must formally submit such Contract documents, with cover letter, based on the program area of the submission, to the following MES mailboxes:</p> <p>MedicaidMMIS@cms.hhs.gov MedicaidE&E APD@cms.hhs.gov</p> <p>2. State copies MES State Officer (SO) in formal submission email.</p>	State	45 CFR 95.611(b)(2)(iii) and (iv)
2	(Workflow Notification)	<p>The mailbox administrator creates a MES Decision Package in the Unified Workflow. In the Decision Package the administrator fills in the following items:</p> <p>1. Name – [State]-[YYYY-MM-DD]-[Funding Type]-[Submission Type]-[Project Name]</p> <p>If opdiv: [State]-[YYYY-MM-DD]-[Funding Type]-[Opdiv]-</p>	Ops Team	Tracking and auditing purposes.

		<p>[Submission Type]-[Project Name]</p> <p>*The date in the naming convention reflects the date the state submitted to the mailbox.</p> <ol style="list-style-type: none"> Acknowledgment Date State Submission Type (APD, Contract...) Funding Type (MMIS/EE/HITECH) <p>Once all items are filled in, the administrator clicks save and this completes the creation of the Decision Package.</p> <p>Acknowledgement Email</p> <ol style="list-style-type: none"> The mailbox administrator will send the acknowledgement email back to the state and cc the State Officer. Add the acknowledgement email to the decision package. Mark the submission as tracked, and acknowledgment sent in the appropriate mailbox. <p>Status Memo</p> <ol style="list-style-type: none"> The mailbox administrator will add the date the submission was received and the date the acknowledgement letter was sent to the state in the status memo field <p>The SO receives an email from the Unified Workflow (UWF) @ (cmsinsight@cms.hhs.gov) with notification of the received submission and associated UWF ID</p>		
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3	Day 3 (UWF Document Decision Set upload)	<ol style="list-style-type: none"> 1. SO reviews the Decision Package and determines if the naming convention fits the state submission. SO can make corrections if the naming convention or any other information is not accurately reflected. (For instance, does the naming convention include the correct project name) This must be updated before sending to FM for review. <p>The SO will also:</p> <ol style="list-style-type: none"> 1. Funding Type: Verify the funding type has been selected appropriately. (If this is a MMIS and HITECH funding request, then the MMIS/HITECH selection should be made. 2. OpDiv: Verify if the submission is a joint project, if so selects the appropriate Multi-Program Agency: FNS or HHS 3. Funding Requested: Verify the requested amount and input the total amount requested for the APD or contract. 4. Vendor: Identify the vendor associated with the contract, and input the vendor from the drop down list. If the vendor is not listed, the SO can choose other. 5. Executive Summary: The SO should have the executive summary section complete with a concise paragraph about the submission that includes a 	MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.
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		summary of the scope and recommended action(s).		
5	Day 15 (Initial review)	<p>Determines if the contract is a competitive or sole source procurement. For sole source, follow these steps. For competitive, follow the rest of this SOP.</p> <p>Determines if there are questions or concerns with the submitted Contract.</p> <p>Any initial comments are issued to the state via email, requiring the state to respond to the concern and/or submit an updated version of the Contract.</p> <p>Email correspondence is uploaded in the UWF decision package and status memo is updated with date of the correspondence.</p> <p>If there are no issues, the SO documents in the status memo that no initial issues exist, and initiates the detailed review.</p>	MES State Officer	
6	By Day 30 (Detailed review completion)	<p>The State officer will review:</p> <ol style="list-style-type: none"> 1. Project scope 2. Project cost 3. Supporting documents submitted 4. Procurement (Competitive or Sole Source) 5. Confirm that the funding is outlined in the previously approved APD <p>If any of the above sections are incomplete or is lacking sufficient detail/clarity, the SO will submit comments/questions to the state, requiring the state to respond to the request for additional information and/or submit an updated version of the Contract.</p>	MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.

		Any remaining comments are documented and issued to the state. The SO documents these in the status memo. If it is anticipated, through communication with the state, that comments issued will NOT be resolved prior to Day 44, a Request for Additional Information (RAI) is initiated.		
	*If RAI is initiated	Follow these steps		
	*Withdrawal	If the State wants to withdraw a submission from CMS review, the state will provide the MES State Officer with an email requesting that the submission be withdrawn. The State Officer will upload this email request into the Unified Workflow and close out the decision package by clicking on 'Submission Withdrawn by State' action.		
7	By Day 44 (Preparing a decision package for clearance)	<p>The State Officer will draft an approval letter using the Contract approval letter template.</p> <p>When a Decision Package is ready for the Clearance process for an approval or RAI action, the following items should be included/upload to the workflow:</p> <ol style="list-style-type: none"> 1. Final draft CMS approval letter 2. Contract (If emailed from the state, the email should be uploaded.) 3. MES Clearance Checklist should be completed with comments included to help with FM review, then uploaded. 4. Any email correspondence between SO, State, Cross 	MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.

		<p>Functional Teams, and Leadership.</p> <p>Team Lead QC</p> <ol style="list-style-type: none"> 1. The SO will reach out to their team lead when their approval letter is ready for review. 2. The team lead will simultaneously review the letter, provide feedback, and fill out the quality check workbook. 3. When the team lead is finished, they will note in the status memo that they reviewed and will let the SO know the review is complete. 4. The SO will review the recommended feedback, make any necessary adjustments, and submit the letter into clearance. <p>SO documents in the status memo when the package is submitted into clearance and submits package for clearance via UWF Notification email. This moves the package to Deputy Director for review.</p> <p>If the letter reflects multiple submissions, each workflow should include</p> <ul style="list-style-type: none"> • the parent/child relationship noted in the executive summary • documentation in ALL the workflows that are included in parent/child approvals (parent/child) (Ex – Checklist for each Ind. Submission, draft approval 		
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		<p>letter, final signed approval letter and email to state with signed approval letter...)</p> <p>However, only the parent workflow for the first action should be submitted for clearance – once the letter has been signed, the SO should return to the workflows for the additional actions and use the 'Cleared as part of a parent decision package' to move them forward.</p> <p>If disapproved, initiate disapproval action</p> <ol style="list-style-type: none"> 1. SO drafts disapproval letter using the disapproval letter template and uploads to Workflow 2. Decision package status memo and executive summary is updated, indicating the reason for disapproval. 3. SO moves Workflow through clearance by choosing "approval" (approval for the disapproval letter) 4. After director signature of disapproval letter - Final disapproval letter issued to the State and cc'd list. 5. SO uploads disapproval letter and email to state to the Workflow, updates status memo field with disapproval date and closes out Workflow. 		
	Day 45 - 49 (Workflow: Clearance – Deputy Director Review /FM Review)	Deputy Director reviews as first level supervisor. Ensures SO has all supporting documentation included in the Decision Package. If not, Deputy Director will either follow up and/or send the workflow back to the SO for additional information	FM Deputy Director	Ensure decision package is complete and ready to move forward through the approval workflow.

		<p>Once Deputy Director approves, they move the decision package along to the FM team.</p> <p>The FM team reviews the submission to ensure financial accuracy to make sure the approval letter's MDBT aligns with previously approved and newly requested funding based on the National MDBT and MBES most recent allotment amounts.</p> <p>FM reviews Ops Checklist, adds comments as needed, and ensures SO has all supporting documentation included in the Decision Package. If not, FM will either follow up and/or send the workflow back to the SO for additional information.</p> <p>Once FM approves, they mark the approval letter as final and moves the decision package along to the Director.</p>		
8	Day 50 (Workflow: Clearance – Deputy Review)	<p>The Workflow will forward the decision package to the Division Director for signature to indicate final approval.</p> <p>When the Approval Letter is signed, the SO will be notified by email from the Workflow. The SO is responsible for sending the signed Approval Letter to the state and use the MESClearance email (MESClearance@cms.hhs.gov) and copy any other FMG and state folks in the approval letter within one business day. The SO also uploads the signed Approval Letter and email sent to the state to the UWF and documents these actions in the status memo. SO will close out the final task via the Approved email</p>	Director MES State Officer	Maintain accurate data about the submission.

		<p>sent by the workflow within one business day.</p> <p>Note: This package should not be marked completed until SO closes out the final task via the Approved Email from the workflow.</p>		
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Sole Source

Step	Timeframe	Action	Person(s) Responsible	Authority/Citation
1	Day 15 (Initial review)	If the contract is a sole source procurement for Automated Data Processing (ADP) equipment or services with a total State and Federal acquisition cost of \$1,000,000 or more, the State must submit a sole source justification, either separately (i.e., a justification letter) or as part of an APDU. That justification should make reference to the procurement policies and procedures used by the State for procurement from non-Federal funds and legitimate the sole source acquisition per the State's procurement policies. The State Officer is responsible for reviewing the justification and providing any questions or concerns to the State.	MES State Officer	45 CFR 95.611(a)(3) 45 CFR 75.326 45 CFR 75.329(f)
2.	Day 20 Escalation Tool	Per leadership, all sole source contracts must be uploaded to the Escalation Tool for review and approval.	MES State Officer MES Leadership	Compliance with internal MES process and ensuring consistent communication about the decision package.
3.	By Day 44 (Preparing a decision package for clearance)	If approved, follow the steps in the Contract SOP . If disapproved, initiate disapproval action 6. SO drafts disapproval letter using the disapproval letter template and uploads to Workflow 7. Decision package status memo and executive summary is updated, indicating the reason for disapproval.	MES State Officer MES Leadership	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.

		8. SO moves Workflow through clearance by choosing “approval” (approval for the disapproval letter) 9. After director signature of disapproval letter - Final disapproval letter issued to the State and cc’d list. SO uploads disapproval letter and email to state to the Workflow, updates status memo field with disapproval date and closes out Workflow.		
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Close Out APD

Closeout APDs included final project costs, remaining unexpended funding, project results, and lessons learned.

Once a state has reached the end of a project and its authorizing MES APD, the state should request that CMS close out the APD. Close out APDs do not get put through the workflow.

Step	Timeframe	Action	Person(s) Responsible	Notes/Reminders
1		<p>Once a state has reached the end of a project and its authorizing MES APD, the state should request that CMS close out the APD.</p> <p>The conclusion of a project means the state does not expect to perform additional system development or enhancement via the dedicated MES APD, making the APD no longer necessary.</p> <p>In the case of an APD supporting development of a new or replacement module, transitioning the module to an operational status and achieving certification from CMS (making the system eligible for 75 percent FFP for ongoing operations)</p>	State	<p>Previously, CMS asked states to submit closeout APDs to formally end an MES development project. Closeout APDs included final project costs, remaining unexpended funding, project results, and lessons learned.</p> <p>As MES development has become more modular, flexible, and outcomes-focused, and states are increasingly engaging in continuous development and enhancement efforts across a broader range of systems and modules, expectations for project APD closeout have evolved.</p> <p>Reminder: There are not closeout APDs under HITECH.</p>

		<p>represents the endpoint for a project APD. Similarly, in the case of an APD supporting enhancements to a previously certified solution, completing the system upgrades and transitioning the improved functionality to an operational status represents the endpoint for a project APD.</p> <p>Upon completing development of a new module and achieving CMS certification for the system, the state should submit an email to their State Officer requesting closure of the associated APD. The state should also note that no additional APD Updates for the project will be submitted.</p>		HITECH APDs will sunset between FFYs 2021 and 2024 as the program winds down.
2		<p>Within 30 days of the state's request for CMS to close out the project APD, CMS will provide a response via email. Unless the State Officer has identified any issues with the project, then the State Officer will confirm that the project APD is now closed. Barring new federal or state mandates requiring additional development to the existing system, the state's next submission for the given module will be an OAPD.</p>	MES State Officer	

State Officer Coverage

	Action	Person(s) Responsible	Notes/Reminders
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State Officer Coverage (holidays, vacation, etc.)	State Officers will work with their team lead to ensure their respective state(s) and/or territory will have sufficient coverage during extended leave for vacation, deployments, and family or medical leave.	State Officer Team Lead Executive Sponsor	
	Upon approval of the backup by the Team Lead, the State Officer shall notify their state(s) of the change in points of contact, duration of the change if known, and direct communications through the appropriate MES mailbox. This ensures future communications from the state regarding the decision package(s) are received by the backup and not left inaccessible in the State Officer's inbox.	State Officer Team Lead Executive Sponsor	

Acquisition Checklist (AC)


The Acquisition Checklist is an optional checklist for States and Territories to use to provide assurance that an acquisition of automated data processing equipment and/or services complies with all Federal regulations and policies. The Federal Department(s), in accordance with the regulations at *45 CFR 95.611*, may grant an exemption from prior approval for an acquisition document based on a State's or Territory's favorable responses to this checklist. States can submit this checklist to meet prior written approval requirements instead of submitting the actual Request for Proposal (RFP), contracts or contract amendments. The Acquisition Checklist allows States to self-certify that their acquisition documents, which include RFPs, contracts, contract amendments or similar documents, meet State and Federal procurement requirements, contain appropriate language about software ownership and licensing rights in compliance with § 95.617, and provide access to documentation in compliance with § 95.615.

This checklist may be used for certain Requests for Proposals (RFP), Requests for Quote (RFQ), Invitations to Bid, contracts, contract amendments, or similar State or Territory acquisition documents; however, it may not be submitted for contracts or Advance Planning Documents that require Federal prior approval (unless specifically exempted by the Department). **You must check with leadership first before allowing a state to use the Acquisition Checklist.**

Request for Additional Information (RAI)

This SOP applies to a submission that is projected to not be approved within the 60-day timeframe.

Step	Timeframe	Action	Person(s) Responsible	Authority/Citation / Purpose
1	RAI is initiated	<p>Notifies team lead and leadership of anticipated RAI no later than Day 40.</p> <p>If it is determined that a RAI is required, State Officer;</p> <ol style="list-style-type: none"> 1. drafts RAI letter to include uploads to Workflow (Final RAI draft must be submitted for clearance via the UWF <u>prior to Day 45.</u>) 2. updates status memo 3. moves Workflow through clearance by choosing RAI 	MES State Officer	45 CFR 95.611(d)
2 3.	*Day 45 (RAI Issued) State Response	<p>After director signature of RAI letter, SO issues final RAI to the State and cc'd list.</p> <p>State Officer;</p> <ol style="list-style-type: none"> 1. Uploads RAI email they sent to the state to the Workflow 2. Updates status memo field. <p>Workflow – This puts submission into a RAI status until state responds (State has 60 days from the RAI letter to respond) or it hits the 60-day clock with not response.</p> <p>If the state responds within the 60 days, SO must add RAI response date into the workflow field which will put the submission back into SO Pending Review status and starts timeframe clock back at 60 days for final approval or disapproval.</p> <p>SO has 60 days to review the states RAI response to ensure it appropriately addresses the RAI.</p> <p>If state response is sufficient – SO generates approval letter and puts through for clearance following normal approval guidelines.</p>	MES State Officer State MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.

	<p>The effective date for an Approval Letter is the date the state responded with the information regarding the RAI.</p> <p>If further information is still needed from state after they have sent the RAI response – SO has 60 days to get this information from the state or disapproval may be initiated.</p> <p>NOTE: A second RAI will not be initiated</p> <p>If state responds within those 60 days: And response is sufficient – SO generates approval letter and puts through for clearance following normal approval guidelines.</p> <p>The effective date for an Approval Letter is the date the state responded with the information regarding the RAI.</p> <hr/> <p>If state response is still not sufficient, Notify Leadership of imminent disapproval action.</p> <ol style="list-style-type: none"> 10. SO drafts disapproval letter using the disapproval letter template and uploads to Workflow 11. Decision package status memo and executive summary is updated, indicating the reason for disapproval. 12. SO moves Workflow through clearance by choosing “approval” (approval for the disapproval letter) 13. After director signature of disapproval letter — Final disapproval letter issued to the State and cc’d list. <p>SO uploads disapproval letter and email to state to the Workflow, updates status memo field with disapproval date and closes out Workflow.</p>		
No Response from State	<p>If state never responds, the submission will be moved to Workflow Closeout to initiate RAI close out process.</p> <p>SO must complete the following steps:</p> <ol style="list-style-type: none"> 1. Draft close out email using the email template 	MES State Officer	 <p>RAI Closeout Process and Closeou</p>

		<ul style="list-style-type: none"> 2. Send email to state with appropriate cc contacts 3. Upload email to workflow package 4. Update Status Memo and Executive Summary <p>Close out package</p>		
Step	Timeframe	Action	Person(s) Responsible	Authority/Citation
1	RAI is initiated	<p>Notifies team lead and leadership of anticipated RAI no later than Day 40.</p> <p>If it is determined that a RAI is required, State Officer;</p> <ul style="list-style-type: none"> 4. drafts RAI letter to include uploads to Workflow (Final RAI draft must be submitted for clearance via the UWF <u>prior to Day 45.</u>) 5. updates status memo 6. moves Workflow through clearance by choosing RAI 	MES State Officer	45 CFR 95.611(d)

Provisional Approval

This SOP applies to a submission that exceeds the 60-day timeframe.

Step	Timeframe	Action	Person(s) Responsible	Authority/Citation / Purpose
1	Notify Leadership	State officer schedules a zoom call to notify MES Deputy Director and team lead of the potential need for a provisional approval letter. State officer adds it to the escalation tool and updates the status memo.	MES State Officer	Leadership must be notified if there is a potential need for a provisional approval letter. <i>45 CFR 95.611(d), Prompt Action on Requests for Prior Approval.</i>
2	Request Template	If the project exceeds day 60, the state officer will request the provisionally approved letter template from one of the deputies and documents these actions in the status memo.	MES State Officer Deputy	Ensure correct template is used
3	Issue Provisional Approval Letter	The state officer issues a provisional approval letter to the state via email. **This happens outside of the workflow.	MES State Officer	
4	Continue Regular Review	Update the status memo and continue to perform the regular review through the workflow. **Refer to previous provisional approval Example: The State's P/IAPD submission exceeded the 60-day review period; therefore, the State's P/IAPD was provisionally approved on MMM DD, YYYY (day 61). CMS approves STATE's APD effective DATE OF SUBMISSION, in accordance with Section 1903(a)(3) of the Social Security Act, 42 CFR 433, Subpart C, 45 CFR 95, Subpart F, and the State Medicaid Manual, Part 11. CMS is authorizing expenditures under this APD in an amount not to exceed the approved Project Medicaid Detailed Budget Table (MDBT) in Appendix A. Authorization of federal funding for this project will expire on MMM DD, YYYY. This approval letter supersedes any prior OMES APD for the Federal fiscal years (FFYs) approved within Appendix A.	MES State Officer	Ensure decision package is complete and ready to move forward through the approval workflow.

	Issue Formal Letter	<p>When the formal Approval Letter is signed, the SO will be notified by email from the Workflow. The SO is responsible for sending the signed Approval Letter to the state and use the MESClearance email (MESClearance@cms.hhs.gov) and copy any other FMG and state folks in the approval letter within one business day.</p> <p>The SO also uploads the signed formal Approval Letter, formal approval letter email sent to the state, provisionally approved letter, and provisionally approved letter email to the state to the UWF package and documents these actions in the status memo. SO will close out the final task via the Approved email sent by the workflow within one business day.</p> <p>Note: This package should not be marked completed until SO closes out the final task via the Approved Email from the workflow.</p>		
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Multi-Program (HHS Operating Divisions (OPDIVs)) APDs and Data Systems

Many States operate large and complex administrative data systems that include information from multiple programs. Federal dollars to support such systems must be allocated across programs. When such systems include two or more of the following HHS programs, requests for funding approval must be submitted to the State Systems Coordinator (SSC) for HHS:

- Title IV-A: Temporary Assistance to Needy Families (TANF)
- Title IV-B and E: Children’s Bureau (ACF) / Child Welfare Services and Foster Care and Adoptive Services
- Title IV-D: Child Support Enforcement (ACF)
- Title XIX and XXI: Medicaid (CMS)

EXHIBIT I-2: PROGRAM FUNDING INFORMATION

Program	Regular FFP Percentage Rate	Enhanced FFP Percentage Rate	Approved by:
Title IV-A: TANF (Block Grant)	N/A	N/A	ACF
Title IV-B: Child Welfare	75	N/A	
Title IV-E: Foster Care and Adoption	50	N/A	
Title IV-D: Child Support	66	N/A	ACF
Title XIX	50	N/A	CMS

Table 1: The table above demonstrates the allocation of cost between HHS Divisions. This can be calculated with the Cost Allocation Methodologies ([CAM](#)) Toolkit version #3.

These submissions are referred to as Multi-Program Advance Planning Documents (APDs).

Overview of the role of the State Systems Coordinator (SSC): Nick Mozer

The State Systems Coordinator’s (SSC’s) primary responsibilities are to coordinate and manage the process and preserve documents in the official archive. The Coordinator lacks both the time and program knowledge to author content. Drafts are written and provided by the programs’ analysts.

Other key responsibilities are to ensure there is agreement across the programs, and to harmonize the language to reflect what the APD rule requires: a single, consolidated response from HHS. This has been characterized as making the letters “HHS-centric.”

Multi-Program APDs are a collaborative process requiring flexibility and no single program can dictate or dominate the form or content.

Key Points of the Current Process

- CMS works from the first draft provided to the SSC (whether provided by CB, OCSE, or CMS).
- The SSC formats that draft and distributes to subsequent reviewers to either approve or redline the formatted draft. This streamlines the process and avoids subsequent versioning issues. (In the past, CMS and ACF were using different version of Word and the use of old templates and old letters often causes formatting instability).
- To avoid any unintended errors, the SSC ONLY accepts minor changes (i.e. changing typos) by phone or in the body of an email. If substantive content needs to be added or removed from the letter, those changes should be made by the analysts to the most recent formatted draft. The SSC is not an analyst and there needs to be a record of which analyst creates content for the letter. When in doubt, ask.
- The final letter is prepared by the SSC, and if any changes besides formatting and minor copy edits are done, the analysts are asked for one more read through and approval.

Final Review/Approvals

- The only approving authority for Multi-Program APDs is the ACF designee who, since April, 2023, is Lauren Supplee, Deputy Assistant Secretary for Planning, Research, & Evaluation.
- Each program (OCSE, CMS, and CB) must complete its own internal processes for reviews and approvals before submitting content to the SSC for the final letter.
- The State Systems Coordinator will never change MDBT, dates, dollars, legal language or citations—anything that appears to be sensitive content—without written confirmation.
- When programs submit a draft to the SSC for review, they may occasionally provide courtesy copies of that draft to all federal partners. Analysts should wait to redline or add comment until they receive the cleaned up, formatted draft from the SSC.

Contacts as of November 2020:

State Systems Coordinator: Nick Mozer (phone: 240-603-0620; Nicholas.Mozer@acf.hhs.gov)

All correspondence (drafts, questions, etc.) about Multi-Program APD controls must be sent to the electronic mailbox: HHSMulti-ProgramAPDSubmissions@acf.hhs.gov.

Step	Timeframe	Action	Person(s) Responsible	Authority/Citation / Purpose
1	Day 1 (SSC Submission)	1. State submits a Multi-OpDiv directly to the HHS mailbox and as a courtesy, the states may copy CMS. 2. The SSC issues submission acknowledgement email to the State once received in the HHS mailbox. As a courtesy, the states send the initial APD	State and State Systems Coordinator	45 CFR 95.610

		<p>email to the HHS mailbox and CCs the SO.</p> <p>3. After review the State Systems Coordinator formally submits a draft approval letter for CMS review and approval. The SSC copies the Division Director and MES State Officer (SO) in the formal submission email. This draft along with supporting documentation is sent to the following MES mailbox:</p> <p>MedicaidMMIS@cms.hhs.gov MedicaidE&E_APD@cms.hhs.gov</p>		
2	Day 1 (Workflow Notification)	<p>The mailbox administrator creates a MES Decision Package in the Unified Workflow. In the Decision Package the administrator fills in the following items:</p> <p>If opdiv: [State]-[YYYY-MM-DD]-[Funding Type]-[Opdiv]-[Submission Type]-[Project Name]</p> <p>*The date in the naming convention reflects the date the state submitted to the mailbox.</p> <ol style="list-style-type: none"> 2. Acknowledgment Date 3. State 4. Submission Type (APD, Contract...) 5. Funding Type (MMIS/EE/HITECH) <p>Once all items are filled in, the administrator clicks save and this completes the creation of the Decision Package.</p>	Ops Team	Tracking and auditing purposes

		<p>Once all items are filled in, the administrator clicks save and this completes the creation of the Decision Package.</p> <p>The SO receives an email from the Unified Workflow (UWF) @ (cmsinsight@cms.hhs.gov) with notification of the received submission and associated UWF ID</p>		
3	<p>Day 1 – 15</p> <p>(Workflow: Decision Package Review and Documentation Upload)</p>	<ol style="list-style-type: none"> 1. SO reviews the Decision Package and determines if the naming convention fits the Multi-Program submission. SO will use the same naming convention the State Systems Coordinator used in order to keep the name uniformed and consistent across programs. 2. SO uploads Multi-Program email submission that includes the supporting documents and HHS acknowledgement email to the UWF decision package. <p>The SO will also add additional content to the workflow decision package:</p> <ol style="list-style-type: none"> 3. Funding Type: SO will verify that the funding type is E&E only. 4. Status Memo: State Officer should be updating the status memo throughout the entire project, indicating the date of 	SSC and MES State Officer	Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.

		<p>each update. (The date the submission was received, the date the HHS acknowledgement letter was sent to the state, and the ongoing progress of the review)</p> <ol style="list-style-type: none"> 5. OpDiv: Verify if the submission is a joint project, if so State Officer selects the appropriate Multi-Program Agency: FNS or HHS 6. Funding Requested: Verify the total FFP requested amount and input the total FFP amount requested for the APD or contract. 7. Vendor: If a contract submission, identify the vendor associated with the contract, and input the vendor from the drop down list. If the vendor is not listed, the SO can choose "other". <p>Executive Summary: The SO should have the executive summary section complete with a concise paragraph that describes what problem is going to be solved, and what outcomes will be achieved by the associated work.</p> <p>This should also include the scope of the request and recommended action (approve, RAI, deny).</p>		
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4	Day 30 - 45 (Detailed Review Period)	<p>Detailed review of the APD or contract is completed per the APD Review Guidelines (SMDL 16-004: APD Requirements). Review will include at a high level, ensuring the scope, schedule, and budget adhere to and are compliant with federal regulations, and that reimbursable activities are identified and categorized according to and outlined in the CMS internal reimbursable activities chart.</p> <ol style="list-style-type: none"> 1. During review of the APD, the scope identified within the executive summary must match the needs and objectives. Importantly, the executive summary should identify the grand total of funding included in the request. 2. If new DDI is being requested, a statement of alternative considerations must be completed, showing that the state has justified the proposed approach. 3. The personnel and contractor resources section must include state and contractor staff descriptions that align with the scope described in the Needs and Objectives section. This section must provide a total 	MES State Officer	<p>Compliance with internal MES process, maintain accurate data about the submission, and ensure consistent communication about the decision package.</p>
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		<p>dollar amount, including FFP requested, for state and contractor costs. All proposed and active contracts must be outlined.</p> <p>4. The Activity Schedule must be updated to reflect both completed and new activity, and should align with the scope as described in the Needs and Objectives section.</p> <p>5. The Proposed Budget Section should be completed, compute correctly, and include the personnel costs. Importantly, this section should also contain non-personnel costs, as well as a quarterly breakout of the requested funding.</p> <p>6. The cost allocation should include all costs identified in the Proposed Budget, inclusive of any other funding source. A detailed description of the state's methodology and subsequent calculation for determining cost share, must be included.</p> <p>7. The assurances need to be completed with explanations and</p>		
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		<p>assurances for compliance with each section.</p> <p>Note: If detailed Review is completed by this time and all comments resolved, the SO documents in the status memo the completion of the detailed review and when the decision package is submitted into clearance. The decision package is finalized and submitted into clearance via the UWF SOP.</p> <p>Any remaining comments are documented and issued to the State Systems Coordinator. The SO documents these in the status memo.</p>		
5	Day 45 - 49 (Workflow: Clearance – Deputy Director Review /FM Review)	<p>Deputy Director reviews approval letter and ensures SO has all supporting documentation included in the Decision Package. If not, Deputy Director will either follow up and/or send the workflow back to the SO for additional information</p> <p>Once Deputy Director approves, they move the decision package along to the FM team.</p> <p>The FM team reviews the submission to ensure financial accuracy to make sure the approval letter's MDBT aligns with previously approved and newly requested funding based on the National MDBT and MBES most recent allotment amounts.</p>	FM & Deputy Director	Ensure decision package is complete and ready to move forward through the approval workflow.

		<p>FM reviews Ops Checklist, adds comments as needed, and ensures SO has all supporting documentation included in the Decision Package. If not, FM will either follow up and/or send the workflow back to the SO for additional information.</p> <p>Once FM approves, they mark the approval letter as final and moves the decision package along to the Director.</p>		
		<p>The Workflow will forward the decision package the Division Director for final approval.</p> <p>When the Division Director Approves the final step, the SO will be notified by email from the Workflow. The SO is responsible for sending confirmation of CMS clearance to the State Systems Coordinator.</p>		Maintain accurate data about the submission.
6	Day 55-60 (ACF Approval Letter)	<p>The State Systems Coordinator will email the State Officer the final approval letter with signature from the ACF Deputy Assistant Secretary.</p> <p>Note: This package should not be marked completed until SO uploads the signed approval letter from SSC and documents these actions in the status memo.</p>	State Officer	

Emergency IT FFP Request

HHS will provide Federal Financial Participation (FFP) at the applicable rates for state expenditures on automated data processing systems, including Medicaid systems, in certain circumstances during emergency situations, if the state submits a request pursuant to 45 C.F.R. §95.624. This SOP details the 14-day process by which States or Territories can request emergency funding from CMS.

Step	Timeframe	Action	Person(s) Responsible	Authority/Citation
1	Day 1 (State Submission)	<p>State submits official emergency request to DSS/DHM, State Officer or one of the official mailboxes (no wrong door for submission).</p> <p>The request must be reflected in a record, and include:</p> <ul style="list-style-type: none"> • A brief description of the ADP (automatic data processing) equipment and/or services to be acquired and an estimate of their costs; • A brief description of the circumstances which result in the State's need to proceed prior to obtaining approval from the Department; and • A description of the harm which will be caused if the State does not acquire immediately the ADP equipment and services. • No budget tables need to be submitted at this point in the process. 	State	<p>45 C.F.R. §95.624</p> <p>More details on Emergency IT Requests and 45 C.F.R. §95.624 are outlined in the COVID Unwinding SHO.</p>
2	Day 1 (Update COVID-19 Trackers)	Ops team (Chaveal) records the submission on the OCD COVID-19 tracker (if related to COVID-19) with pertinent information from the submission.	Ops Team	
3	Day 1 - 5 (Review of submission)	<p>Acknowledgement Email</p> <ol style="list-style-type: none"> 1. The mailbox administrator will send the acknowledgement email 	MES State Officer and Subject Matter Experts/Leadership as-needed	45 C.F.R. §95.624

		<p>back to the state and cc the State Officer.</p> <ol style="list-style-type: none"> 2. Add the acknowledgement email to the decision package. 3. Mark the submission as tracked, and acknowledgment sent in the appropriate mailbox. <p>Status Memo</p> <ol style="list-style-type: none"> 1. The mailbox administrator will add the date the submission was received and the date the acknowledgement letter was sent to the state in the status memo field <p>State Officer reviews the emergency FFP request and involves Subject Matter Experts and Leadership as-needed.</p> <p>Emergency FFP requests should be simple, reasonable, and concise. Alternatives analysis, cost/benefit, and cost allocation are not required. However, an emergency FFP request should address the three items identified above (see Day 1), as well as be timely to the actual emergency. This means that emergency FFP requests should generally include cost estimates for approximately the next 90 days, with a description of what harm will occur if the funding is not authorized.</p> <p><i>CMS must either approve or disapprove the request within 14 days of the submission.</i></p> <p>If disapproved, initiate disapproval action</p>		
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		<ol style="list-style-type: none"> 1. SO drafts disapproval letter using the disapproval letter template and uploads to Workflow 2. Decision package status memo and executive summary is updated, indicating the reason for disapproval. 3. SO moves Workflow through clearance by choosing "approval" (approval for the disapproval letter) 4. After director signature of disapproval letter - Final disapproval letter issued to the State and cc'd list. 5. SO uploads disapproval letter and email to state to the Workflow, updates status memo field with disapproval date and closes out Workflow. 		
4	(Draft approval letter and send to leadership)	Once ready for approval, State Officer drafts emergency FFP approval letter and emails draft to DSS/DHM leadership. They will also link the letter the letter to SharePoint. These actions are not submitted through the SharePoint workflow process. Additionally, MDBTs are different for Emergency IT Requests than how they are outlined for traditional APD actions. For these requests, there is a "CORE" piece required in the MDBT and its naming convention.	MES State Officer	
5.	(DSS/DHM review letter)	DSS/DHM leadership review the approval package and send to DSG for approval.	DSS/DHM Leadership	
6.	(DSG review and send to OA)	<p>DSG sends the following information to OCD/OA:</p> <ul style="list-style-type: none"> o Date the approval letter will be issued o What time DSG expects letter expect it to be 	DSG	

		<p>transmitted to the state</p> <ul style="list-style-type: none"> ○ A copy of the package (approval letter) that is provided to the state 		
7.	Day 14 (Letter sent to state)	Once DSG clears the letter, it can be signed and the MES SO can transmit to the state per process outlined above for OA.	MES State Officer	
8.	(Update trackers)	Ops team updates the COVID tracking folder on SharePoint with approval letter and the approval date on the DSS/DHM tracker and the OCD tracker.	Ops Team	
9.	(APD requirement)	<p>Within 90 days or less the state submits an official APD to DSS/DHM which will include retroactive funding back to the date of the original emergency FFP request from the state.</p> <p>If the state fails to submit an APD within 90 days of their emergency submission, then the State Officer should initiate the Reconsideration of Denied FFP process.</p>	State	45 C.F.R. §95.624 (b)(2)

Reconsideration of Denied FFP for Failure to Obtain Prior Approval

For Automated Data Processing (ADP) equipment and services acquired by a State without prior approval, which is reflected in a record, the State may request reconsideration of the disallowance of FFP by written request to the head of the Federal program office within 30 days of the initial written disallowance determination.

Timeframe	Action	Person(s) Responsible	Authority/Citation
Day 1 (State Submission)	<p>The state or territory formally submits a request for reconsideration of denied FFP to the DSS Director and their State Officer within 30 days of the disallowance, by submitting the request to one of the following MES mailboxes:</p> <p>MedicaidMMIS@cms.hhs.gov MedicaidE&E_APD@cms.hhs.gov MedicaidHITECH@cms.hhs.gov</p>	State	CFR 95.623
Day 1 (Escalation Tool)	<p>The MES State Officer adds the submission to the MES Escalation Tool.</p> <p>Doing this will create a new alert for DSS leadership to convene the review board and review the request.</p>	State Officer	
Day 14 (DSS/DHM Board Review)	<p>The DSS/DHM Reconsideration board convenes the DSS & DHM managers and State Officer for a review meeting (Dzung Hoang – DHM Director serves as Board Chair). The State Officer shares the details of the State's request with the board for their review.</p>	State Officer and DSS/DHM Board	
(Board Decision)	<p>The Board comes to a decision based on the following criteria:</p> <ol style="list-style-type: none"> 1. The acquisition must be reasonable, useful and necessary; 2. The State's failure to obtain prior approval, which is reflected in a record, must have been inadvertent (i.e., the 	DSS/DHM Board	CFR 95.623

	<p>State did not knowingly avoid the prior approval requirements);</p> <ol style="list-style-type: none"> 3. The request was not previously denied by HHS; 4. The acquisition must otherwise meet all other applicable Federal and State requirements, and would have been approved under part 95, subpart F had the State requested in a record, prior approval; 5. The State must not have a record of recurrent failures, under any of the programs covered by the prior approval regulations, to comply with the requirement to obtain prior approval in a record, of its automatic data processing acquisitions (i.e., submissions under these procedures, from States that have failed in the past to acquire prior approval which is reflected in a record, in accordance with part 95, subpart F, may be denied). 		
(Approval Letter)	<p>If the Board approves the request, then the State Officer drafts an approval letter with the newly reconsidered effective date (per State's reconsideration request).</p> <p>The State Officer loads the approval letter and documentation into the workflow, with the usual clearance process. MDBT updates may be necessary.</p>	State Officer	

Conditions for System Re-approval and Procedures for Reduction of FFP after Re-approval Review

Timeframe	Action	Person(s) Responsible	Authority/Citation
Day 1	CMS initiates a review or reapproval action for a specific module or subsystem. At the conclusion of that initial review or reapproval action, if the module is found to be out of compliance a Status Letter is drafted.	CMS	Initial Approval 42 § 433.117 Reapproval 42 § 433.119
Within 30 days of the initial review or reapproval action	The drafted Status Letter for the module is finalized and cleared through the Certification clearance process. Status Letter includes: <ol style="list-style-type: none"> 1. Description of any documented deficiencies that identify out of compliance module functionality. 2. A deadline by which the deficiencies must be rectified. 	CMS	
Status Letter Issued	Finalized status letter is issued to the state.	CMS	
Compliance Letter Drafted 30 Days Prior to Status Letter Deadline	If the state has not resolved the deficiencies identified in the Status Letter, a Compliance Letter is drafted. Compliance Letter includes: <ol style="list-style-type: none"> 1. A description of the outstanding deficiencies. 2. A reduction of FFP from enhanced (75) to regular (50) for the module, effectuated through an adjustment to the state's MDBT (attached with the compliance letter). 3. A description of the process by which the state can request reapproval of the module once the documented deficiencies are rectified. 	CMS	42 § 433.120
Compliance Letter Issued	Finalized status letter is issued to the state.	CMS	

State Initiated Review of Compliance Status	The state initiates a reapproval request wherein CMS determines upon subsequent review that the system meets all current performance standards, system requirements and other conditions of reapproval.	State	42 § 433.122
Reapproval Letter Issued	If the reapproval of the system is deemed compliant, CMS will resume FFP in expenditures for system operations at the 75 percent level beginning with the quarter following the review determination that the system again meets conditions of reapproval.	CMS	42 § 433.122

Timely Filing Requirement for FFP

This Standard Operating Procedure (SOP) describes the process used by the Data Systems Group (DSG), Financial Management Group (FMG) and the Regional Offices Group (ROG) for when a system is certified beyond 2 years of the go live date and a Good Cause Waiver is submitted by the state requesting to claim funds beyond the 2 year limit.

Timeframe	Action	Person(s) Responsible	Authority/Citation
1. System is Certified	DSG submits a copy of the certification letter to ROG and FMG upon certification where instances are beyond 2 years.	DSG	42 Code of Federal Regulations (CFR) Part 433, Subpart C
2. Good Cause Waiver Submitted	State submits the Good Cause Waiver to FMG to request approval and claim funds for system M&O beyond 2 years. This is for instances where a certification review has determined that the system was certified and eligible for 75% FFP for time periods beyond 2 years pending approval.	State	45 CFR § 95, Subpart A
3. Good Cause Waiver Shared	FMG submits a copy of the Good Cause Waiver to ROG and DSG for review and input	FMG	
4. Input and Recommendations Provided	DSG provides input and recommendations to FMG to assist with the waiver decision	DSG	
5. Final Good Cause Waiver Decision	FMG makes the final Good Cause Waiver decision and shares with DSG, ROG, and the state.	FMG	
6. Waiver Approved	Upon approval of the Good Cause Waiver, the state would need to submit and receive approval of an APD requesting the fund amounts beyond 2 years.	State	42 CFR Part 447
Waiver Declined	Upon declining of the Good Cause Waiver, the state would need to submit and receive approval of an APD requesting all funds up to 2 years.	DSG	

Cost Allocation Overview and Process for MES Projects

This document provides an overview and guide for cost allocation activities across all Medicaid Enterprise System (MES) projects. It is designed to supplement the MES Standard Operating Procedure document, and provide State Officers with background information, regulatory citations, and key processes to assist with reviewing and approving a cost allocation plan as part of an Advance Planning Document (APD) request. Version 6 - 03/19/2024

Section One: Overview

WHAT IS A COST ALLOCATION PLAN?

A cost allocation plan (CAP) is the document that State agencies submit to federal benefiting programs for approval during the Advance Planning Document (APD) process to obtain federal funding for a portion of State system costs. The cost allocation plan describes the State agency's methodology for calculating the cost distribution for each benefiting program under the project, and shows the proposed programs' share of cost by percentage and dollar amount. Each federal benefiting program must review the State agency's cost allocation plan.

CAPs must include a projection of the coming year's allocated costs. Projected costs should be based on either actual cost for the most recently completed year or the budgeted projection for the coming year. CAPs must also include a reconciliation of the actual costs.

WHAT DO STATES NEED TO PROVIDE IN THEIR APDs?

Federal agencies use the APD process to outline State agency requests for FFP for Medicaid systems projects with anticipated total project costs, and request CMS approval. As part of the APD process, State agencies are required to submit cost allocation information beginning with system planning and continuing through system development and operations. Allocation means the process of assigning a cost or a group of costs to one or more activities in reasonable proportion to the benefit provided or other equitable relationship. In addition to all of the APD requirements identified at [45 CFR 95.610](#), specific cost allocation information is required in APDs:

- For Planning APDs (PAPDs) – states must provide “An estimated total project cost and a prospective State and Federal cost allocation/distribution, including planning and implementation.”
- For Implementation APDs (IAPDs)– states must provide “An estimate of the prospective cost allocation/distribution to the various State and Federal funding sources and the proposed procedures for distributing costs.”

- For annual APD updates – states must provide “A report of any approved or anticipated changes to the allocation basis in the APD's approved cost allocation methodology.”
- In addition to the other As-Needed APD update triggers, states must submit an As-Needed APD update “When the State anticipates significant changes to its cost distribution methodology or distribution of costs among Federal programs.”
- For Operational APDs (OAPDs) – States are required to include the project’s “Annual budget by project/system receiving funding through the programs.” The budget should include a description of the state’s cost allocation plan and methodology currently on file with HHS’ Division of Cost Allocation Services (CAS). If the cost allocation plan is not currently filed with DHHS’ CAS, per [45 CFR 95.517](#), the state may claim FFP based on the proposed plan. “However, where a State has claimed costs based on a proposed plan or plan amendment the State, if necessary, shall retroactively adjust its claims in accordance with the plan or amendment as subsequently approved by the Director, DCA.”

WHAT IS THE DIFFERENCE BETWEEN A DESIGN, DEVELOPMENT, AND IMPLEMENTATION (DDI) COST ALLOCATION PLAN AND AN OPERATIONAL COST ALLOCATION PLAN IN AN APD?

For PAPDs and IAPDs, the State Officer/MES team issues the final decision, inclusive of the cost allocation included in the PAPD/IAPD. If a state submits a combined IAPD and OAPD, the MES team still retains the authority to review and approve the APD, inclusive of the cost allocation included in the submission.

For Operational APDs (OAPDs), the State Officer/MES team issues the final decision for the OAPD and provides feedback to HHS’ CAS specific to the state’s related cost allocation methodology and description of the CAP documented in the OAPD, however, HHS’ Division of Cost Allocation Services (CAS) issues the final decision for the related CAP.

Importantly, a state’s operational cost allocation plan is reviewed and approved by DHHS’ CAS, in consultation with the State Officer/MES team. However, the methodology and description of the cost allocation plan should be documented in the state’s OAPD submission.

WHAT IS THE HHS DIVISION OF COST ALLOCATION SERVICES AND HOW DOES THE MES TEAM REVIEW AND APPROVE OAPDS IN CONJUNCTION WITH THIS DIVISION?

Allocation of system development costs was assigned to the funding agencies in 1986. All participating federal agencies must approve cost allocation plans for development costs. Indirect cost rates and cost allocation plans are used by grantee institutions to charge federal programs for administrative and facility costs associated with conducting federal programs. The Office of Management and Budget (OMB) has designated DHHS’ Division of Cost Allocation Services as the “Cognizant Federal agency” for approval of operational cost allocation plans only. As the Cognizant Federal agency, DHHS’ Division of Cost Allocation Services is responsible for reviewing and negotiating facility and administrative (indirect) cost rates, fringe benefit rates, and special rates as determined to be appropriate. This includes costs related to researching patient care rates and statewide cost allocation plans and public assistance cost allocation plans for operational costs.

DHHS' CAS provides technical assistance and guidance to both federal departments and agencies and the grantee community. DHHS' CAS resolves audits involving indirect costs, cost allocation issues, and cost allocation methodologies. DHHS' CAS provides indirect cost rate and cost allocation plan negotiation services to federal departments and agencies for which DHHS is designated by OMB as the Cognizant Federal agency. DHHS' CAS represents the federal government during negotiations and has a fiduciary responsibility to protect the public funds and to communicate and negotiate with the grantee community.

Operational cost allocation plans are reviewed and approved, in consultation with the participating agencies, by DHHS' CAS. The methods of cost allocation should be documented in a state's Operations APD to support the proposed budget.

Section Two: DDI APD Requirements

REGULATORY CITATIONS

- **45 CFR 95.610:**
 - **Planning APDs** – states must provide “An estimated total project cost and a prospective State and Federal cost allocation/distribution, including planning and implementation.”
 - **Implementation APDs** – states must provide “An estimate of the prospective cost allocation/distribution to the various State and Federal funding sources and the proposed procedures for distributing costs.”
 - **Annual APD updates** – states must provide “A report of any approved or anticipated changes to the allocation basis in the APD's approved cost allocation methodology.”
 - **As-Needed APD updates** – states must submit an As-Needed APD update “When the State anticipates significant changes to its cost distribution methodology or distribution of costs among Federal programs.”
- **45 CFR 95.631(a)(1) & (2):**
 - (a) *Development costs.*
 - (1) Using its normal departmental accounting system, the State agency shall specifically identify what items of costs constitute development costs, assign these costs to specific project cost centers, and distribute these costs to funding sources based on the specific identification, assignment and distribution outlined in the approved APD;
 - (2) the methods for distributing costs set forth in the APD should provide for assigning identifiable costs, to the extent practicable, directly to program/functions. The State agency shall amend the cost allocation plan required by [subpart E of this part](#) to include the approved APD methodology for the identification, assignment and distribution of the development costs.

WHAT IS CONSIDERED A DDI COST ALLOCATION PLAN

DDI APDs must include an estimate of the prospective cost allocation/distribution to the various State and Federal funding sources and the proposed procedures for distributing costs.

The prospective cost allocation should follow the plan requirements outlined at [45 CFR 95.507](#):

1. A description of the procedures used to identify, measure, and allocate all costs to each of the programs
2. Conform to the accounting principles and standards prescribed in Office of Management and Budget Circular A-87, and other pertinent Department regulations and instructions
3. Contain sufficient information in such detail to make an informed judgment on the correctness and fairness of the state's procedures for identifying, measuring, and allocating the costs
4. The cost allocation plan shall contain the following information:
 - a. An organizational chart showing the placement of each unit whose costs are charged to the programs operated by the state agency.
 - b. A listing of all federal and all non-federal programs performed, administered, or serviced by these organizational units.
 - c. A description of the activities performed by each organizational unit and, where not self-explanatory an explanation of the benefits provided to federal programs.
5. The procedures used to identify, measure, and allocate all costs to each benefiting program and activity (including activities subject to different rates of FFP).

STEPS IN APPROVING THE COST ALLOCATION AND ITS METHODOLOGY IN A DDI APD

1. The PAPD, IAPD, or IAPD/OAPD and their Updates are submitted by the state for CMS State Officer review. **Additionally, for any DDI APDs which include Operations activities/costs, we follow the same process in this DDI section.**
2. The APDs are reviewed, including the DDI Cost Allocation Plan/Methodology, by the State Officer until the final Cost Allocation Plan/Methodology is mutually agreed upon between CMS and State.
3. The agreed upon DDI Cost Allocation Plan/Methodology must be noted and approved in the APD Approval Letter. The approval letter cost allocation language needs to be included to notify the state that they must file the cost allocation with DHHS' CAS.

PLEASE NOTE: Funding approval in this APD is subject to 45 CFR 95.631 which requires states to amend the cost allocation plan required by 45 CFR 95 Subpart E to include the approved APD methodology for the identification, assignment, and distribution of the development costs. The state must contact the Department of Health and Human Services Division of Cost Allocation Services (DHHS' CAS) to file and/or amend the state's Cost Allocation Plan accordingly.

4. State Officer should remind the state that the operations cost allocation plan must be reviewed and approved by DHHS' CAS if it is not already approved, and the related language must be included in the decision letter, as applicable.
5. FMG is to be notified when the OAPD APD approval letter is issued.

Reminder: For DDI APDs, the MES team makes the final call for APD approvals, inclusive of the cost allocation plan/methodology.

STEPS TO APPROVE THE COST ALLOCATION PLAN / METHODOLOGY IN A DDI APD

SOP STEPS*	ACTION
STEP 1 State Submission (Day 1)	The State formally submits a DDI APD or APDU, including a new or amended DDI Cost Allocation Plan/Methodology, with cover letter to the appropriate MES mailbox.
STEP 2 State Officer Review (By Approx. Day 15)	The State Officer reviews the proposed Cost Allocation Plan/Methodology in the context of the APD and works with the State to reach a mutually agreed upon version of the Cost Allocation Plan, including consultation with the Cost Allocation SME Team members (Jamie Miller, Nora Huvane, Careenza Love), as necessary.
STEP 3 DSS/DHM Board Review (By Approx. Day 20)	The State Officer requests meeting via Zoom with the Cost Allocation SME Team and DSS/DHM leadership (Dzung Hoang, Ed Dolly, Ric Melendez, Eugene Gabriyelov), which is the DSS/DHM Cost Allocation Board. No less than one business day prior to the meeting, the State Officer shares the proposed or amended Cost Allocation Methodology from the State's APD with the board via email, and provides any necessary additional context/explanation, as well as their recommendation.
STEP 4 DSS/DHM Board Decision (By Approx. Day 30)	The DSS/DHM Cost Allocation Board considers the State's Cost Allocation Methodology and the State Officer's recommendation and issues a final decision (approval / disapproval) or requests additional information.
STEP 5 Approval Letter (By Approx. Day 45)	<p>If the Board approves the request, then the State Officer drafts an APD approval letter using the APD w/ Cost Allocation approval letter template. As applicable per the MES Cost Allocation SOP, the approval letter also includes language notifying the State that they must file the Cost Allocation with DHHS' CAS:</p> <p>PLEASE NOTE: Funding approval in this APD is subject to 45 CFR 95.631, which requires states to amend the cost allocation plan required by 45 CFR 95 Subpart E to include the approved APD methodology for the identification, assignment, and distribution of the development costs. The</p>

	<p>State <u>must</u> contact the Department of Health and Human Services’ Division of Cost Allocation Services (DHHS’ CAS) to file and/or amend the State’s Cost Allocation Plan accordingly.</p> <p>The State Officer follows APD clearance process to issue decision to the State.</p>
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*The State Officer should manage the DDI cost allocation plan review with an eye on the 60-day clock against which they are conducting the larger APD review. The “SOP Steps” column above suggests days on the 60-day clock by which to perform the cost allocation review steps, to ensure the State Officer’s APD review is completed within the 60-day period allowed by regulation.

Section Three: Operations APD Requirements

REGULATORY CITATIONS

- **45 CFR 95.631(b)**

The conditions of this subpart apply notwithstanding the existence of an approved cost allocation plan. State agencies shall assign and claim the costs incurred under an approved APD in accordance with the following criteria:

(b) *Operational costs.* Costs incurred for the operation of an ADP system shall be identified and assigned by the State agency to funding sources in accordance with the approved cost allocation plan required by [Subpart E of this part](#).

DIFFERENCES BETWEEN DDI AND OPERATIONS

Operational cost allocation plans are reviewed and approved, in consultation with the participating agencies, by DHHS’ CAS. However, the methods of cost allocation should be documented in the state Operations APD submission to support the proposed budget.

Importantly, 45 CFR 95.517 (a) allows for a state to claim FFP for both an approved cost allocation plan or, at the state’s option, they may claim FFP based on a proposed cost allocation plan.

(a) A State must claim FFP for costs associated with a program only in accordance with its approved cost allocation plan. However, if a State has submitted a plan or plan amendment for a State agency, it may, at its option claim FFP based on the proposed plan or plan amendment, unless otherwise advised by the DCA. However, where a State has claimed costs based on a proposed plan or plan amendment the State, if necessary, shall retroactively

adjust its claims in accordance with the plan or amendment as subsequently approved by the Director, DCA. The State may also continue to claim FFP under its existing approved cost allocation plan for all costs not affected by the proposed amendment.

WHAT IS CONSIDERED AN OPERATIONS COST ALLOCATION PLAN

From 45 CFR 95.507, the cost allocation plan should include the following:

1. A description of the procedures used to identify, measure, and allocate all costs to each of the programs
2. Conform to the accounting principles and standards prescribed in Office of Management and Budget Circular A-87, and other pertinent Department regulations and instructions;
3. Contain sufficient information in such detail to make an informed judgment on the correctness and fairness of the state's procedures for identifying, measuring, and allocating the costs
4. The cost allocation plan shall contain the following information:
 - a. An organizational chart showing the placement of each unit whose costs are charged to the programs operated by the state agency.
 - b. A listing of all federal and all non-federal programs performed, administered, or serviced by these organizational units.
 - c. A description of the activities performed by each organizational unit and, where not self-explanatory an explanation of the benefits provided to federal programs.
5. The procedures used to identify, measure, and allocate all costs to each benefiting program and activity (including activities subject to different rates of FFP).

Reminder: Operational cost allocation plans are reviewed and approved, in consultation with the participating agencies, by DHHS' CAS. The methods of cost allocation should be documented in the state operations APD update submission to support the proposed budget.

STEPS TO APPROVE THE COST ALLOCATION PLAN / METHODOLOGY IN AN OAPD

SOP STEPS*	ACTION
STEP 1 State Submission (Day 1)	The State formally submits an OAPD, including the Cost Allocation Plan/Methodology, with cover letter to the appropriate MES mailbox.
STEP 2 State Officer Review (By Approx. Day 15)	The State Officer reviews the Cost Allocation Plan in the context of the APD. The methods of cost allocation should be documented in the OAPD to support the activities and budget. The State Officer confirms with the State whether the included CAP is proposed or has been approved by the DHHS' CAS.

	<ol style="list-style-type: none"> 1. A proposed cost allocation means that the cost allocation plan is not yet approved by DHHS' CAS or CMS, and the state must submit the CAP for DHHS' CAS review and approval in accordance with 45 CFR 95.507 (CAS' final decision incorporates the State Officer's feedback and recommendation). 2. An approved cost allocation means that DHHS' CAS has already approved the cost allocation plan and methodology for this project. <ul style="list-style-type: none"> 2a. If the OAPD includes a proposed or amended CAP, or if the State Officer doesn't agree with DHHS' CAS approved CAP, the State Officer works with the State to reach a mutually agreed upon version of the CAP, and then goes to Step 3. 2b. If the OAPD includes an approved CAP that the State Officer finds acceptable, go to Step 5.
STEP 3 DSS/DHM Board Review (By Approx. Day 20)	<p>The State Officer requests a meeting via Zoom with the DSS/DHM Cost Allocation Board. No less than one business day prior to the meeting, the State Officer copies and shares the Cost Allocation Methodology from the State's OAPD with the board via email, and provides any necessary additional context/explanation, as well as their recommendation.</p>
STEP 4 DSS/DHM Board Decision (By Approx. Day 30)	<p>The DSS/DHM Cost Allocation Board considers the State's Cost Allocation Methodology and the State Officer's recommendation and issues a final decision (approval / disapproval) or requests additional information.</p>
STEP 5 Approval Letter (By Approx. Day 45)	<p>If the Board approves the request or the OAPD already includes an approved CAP that is acceptable to the State Officer per Step 2b, the State Officer drafts an APD approval letter that includes a Cost Allocation Plan table. As applicable, the approval letter also includes language notifying the State that they must file the Cost Allocation with DHHS' CAS.</p> <p>The OAPD approval letter must include the language below which provides guidance to the state regarding 95.517. As per this language, the state will need to either file a new cost allocation plan or amend their existing cost allocation plan with DHHS' CAS.</p> <p><u>PLEASE NOTE:</u> Funding approval in this APD is subject to 45 CFR 95.631, which mandates that costs incurred for the operation of an Automated Data Processing (ADP) system be identified and assigned by the State to funding sources in accordance with the approved cost allocation plan required</p>

	<p>by 45 CFR 95, Subpart E. The State <u>must</u> contact the Department of Health and Human Services’ Division of Cost Allocation Services (DHHS’ CAS) to file and/or amend the State’s Cost Allocation Plan, as needed.</p> <p>Additionally, 45 CFR 95.611 requires that the State provide an APD-Update when there is a change to the approved cost methodology.</p> <p>The State Officer follows APD clearance process to issue decision to the State, ensuring that the decision letter to the state also includes FMG and HHS’ CAS in the email distribution.</p>
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*The State Officer should manage the operations cost allocation plan review with an eye on the 60-day clock against which they are conducting the larger OAPD review. The “SOP Steps” column above suggests days on the 60-day clock by which to perform the cost allocation review steps, to ensure the State Officer’s OAPD review is completed within the 60-day period allowed by regulation.

Section Four: Escalation and Coordination

PROCESS FOR INFORMING AND ESCALATING TO FMG AND HHS-CAS

Because DSG approves APDs on the front-end, DSG is not responsible for auditing system operations cost allocation plans. However, since DSG State Officers often see potential discrepancies through regular project oversight, DSG escalates and coordinates issues to other CMS divisions. Specifically, DSG will escalate and coordinate with FMG and HHS’ Cost Allocation Services for the appropriate auditing and reviews necessary.

Reminder:

- For DDI APDs, the MES team makes the final determination for APD approvals, inclusive of the review and approval for the cost allocation included in the PAPD, IAPD, IAPD/OAPD or their updates.
- For Operational APDs, cost allocation plans are reviewed and approved by DHHS’ CAS. However, the methods of cost allocation should be documented in the state operations APD submission to support the proposed budget.

ESCALATION PROCESS FOR FMG AND HHS-CAS

1. When issues or items for escalation are discovered, the State Officer creates an escalation item for review in the [MES Escalation Tool](#).

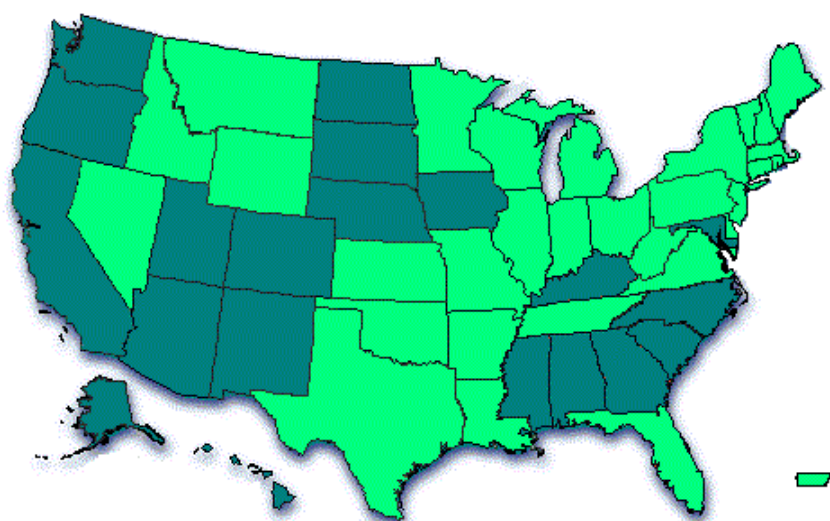
2. If leadership determines the need to escalate to FMG & DHHS' CAS, the State Officer drafts an issues paper for review by DSG leadership.
3. Once cleared by DSG leadership, the issues paper is provided to FMG & HHS-CAS, and subsequent follow-up meetings are scheduled.
4. DSG then defers to the FMG & DHHS' CAS processes for relevant follow-up and auditing support. DSG provides support to FMG and DHHS' CAS as needed to provide any background or additional information necessary.
5. FMG & DHHS' CAS conduct their follow-up, and report back to DSG on the next steps and/or results.
6. If necessary, the results of this escalation may trigger an APD update from the state, as such the State Officer should expect an updated APD to be submitted by the state.

Section Five: Key HHS-CAS Contacts and Other Resources

CONTACT INFORMATION FOR HHS-CAS	CONTACT INFORMATION FOR CMCS-FMG COST ALLOCATION LEADS
Amritha Sugrim Singh Branch Chief – State & Local Governments, Cost Allocation Services Program Support Center, Financial Management Portfolio U.S. Department of Health and Human Services 26 Federal Plaza, Room 3412 New York, NY 10278 Office: (212) 264-4300 Amritha.Sugrim-Singh@psc.hhs.gov	Joseph Raymundo CMCS Financial Management Group Division of Reimbursement Review 404-562-7496 Joseph.Raymundo@cms.hhs.gov
Cora Coleman Branch Chief – State & Local Government, Cost Allocation Services Program Support Center, Financial Management Portfolio U.S. Department of Health and Human Services 90 7th Street, Suite 4-600 San Francisco, CA 94103 Office: (415) 437-7821 Cora.Coleman@psc.hhs.gov	Deborah Benson CMCS Financial Management Group Division of Reimbursement Review 312-886-0360 Deborah.Benson@cms.hhs.gov

For purposes of submitting new or amended Cost Allocation Plans for HHS CAS review and approval, states are divided by Region, per the map below. For states in the Northeastern and Central Regions (i.e., the light green states on the map), CAP submissions should be sent to the CAS-NY@psc.hhs.gov mailbox, with a cover letter addressed to Amritha Sugrim Singh, per her contact information above. For states in the Western and Mid-Atlantic Regions (i.e., the teal green states on the map), CAP submissions should be sent to the CAS-SF@psc.hhs.gov mailbox, with a cover letter addressed to Cora Coleman, per her contact information above.

State Submission Map to HHS CAS for Cost Allocation Plan Review



MAP KEY

Light Green States (Northeastern and Central Regions): CAS-NY@psc.hhs.gov

Teal Green States (Western and Mid-Atlantic Regions): CAS-SF@psc.hhs.gov

Review and Approval of Proposed Cost Allocation Plans or Amendments

Within sixty (60) days of receipt of a proposed cost allocation plan or amendment, the Director of the HHS Division of Cost Allocation field office will notify the state that the submission is either specifically approved or disapproved, that modifications are needed in order for approval to be granted, or that additional information is needed to evaluate the submission. Also, if a determination cannot be made within the 60 day period, the field office will notify the state. If a plan submission is disapproved, the state will be notified accordingly, along with the reasons for the disapproval. Under 45 CFR Part 16, a state may appeal a disapproval of a plan submission so long as the appeal is postmarked no later than

30 days after receipt of the determination letter. (45 CFR § 16.7(a)). **UPDATE:** Presently, due to HHS CAS and OpDiv staffing limitations, CAS is challenged to provide a response within 60 days.

STATE SYSTEMS APD GUIDE

<https://www.acf.hhs.gov/css/training-technical-assistance/state-systems-apd-guide>

Cost Allocation Plan Format for System Builds Benefiting Multiple Programs

Estimated Implementation Phase Budget

Federal/State Program	Program Share of Cost	Amount (\$)	FFP Rate	Federal Share (\$)	State Share (\$)
TOTAL					

For planning APDs, the Federal program offices have indicated that they will accept cost allocation of equal shares among programs participating in the planning phase. This is not the only acceptable cost allocation methodology for planning. Other reasonable approaches to allocating costs during this phase will also be considered.

MES Regarding FOIA Requests

CMS' oversight of states' MES projects and funding involves possession of sensitive materials, instruments, and products that often contain state procurement, contractual, and proprietary-sensitive information, financial/budget data, and relevance to system/data security and program vulnerability. This includes vendor and contractor proprietary systems and business products, as well as system security artifacts.

The materials, instruments, and products (i.e., Medicaid Management Information Systems [MMIS], Eligibility and Enrollment systems [E&E], and Health Information Technology for Economic and Clinical Health systems [HITECH] systems) include:

- The State Planning, Implementation, and Operational Advance Planning Documents (APDs) and their amendments
- The State Request for Proposals (RFPs), Request for Information (RFI)
- The State Evaluation Plans
- The Vendor Technical/Business Proposals, and Cost Proposals
- Procured Contracts, MOUs, MOAs, SOWs, and their amendments
- The State Audit Plans and Strategies


- Systems Certification Documentation (System/Interface Documentation, Test Plans/Test Results, Third Party System Security Audits, Product Roadmaps, Business Continuity Plans)

CMS approval letters for State APDs, RFPs, EPs, contracts, and their Amendments/Updates (including approved Federal/State funding and project budgets), CMS Systems Certification letters and reports, State systems operational reporting, and other official system correspondence and reports specific to State Medicaid IT projects

SOP for FOIA Requests: Steps 1 through 8

Step	Step Description	Action	Person(s) Responsible
1.	State Officer receives FOIA request via email from DSG Front Office	State Officer receives FOIA request with a SWIFT ID number; the email will include a link to a CMCS OSG SharePoint site folder. State Officer will review the FOIA request in the OSG SharePoint folder to confirm they are the correct State Officer to handle the request.	DSG Special Assistant State Officer
2.	State Officer reviews the FOIA request	State Officer reviews the FOIA request for MES relevance (i.e., does it request information in the possession of the MES team?) and appropriateness (i.e., conduct online search for requester and background).	State Officer
3.	State Officer establishes a new item in the MES Escalation Tool for the FOIA request	State Officer will establish a new item in the MES Escalation Tool describing the FOIA request for MES leadership to track and review.	State Officer MES Manager
4.	State Officer conducts search and collects applicable materials	State Officer searches for and collects applicable materials – ONLY the necessary documentation/materials to meet the FOIA request.	State Officer
5.	State Officer reviews collected documentation and materials to determine releasability	State Officer reviews collected documentation and materials to determine: Materials considered closed, not active, and releasable: Documents the State has already publicly released (online) Contract is closed / Procurement is completed with limitations Project APD is closed / Contract is expired / RFP has been released to vendor community	State Officer

		<p>Materials considered <u>not releasable</u>: Project APD and/or Contract are still active and ongoing Project APD, RFP, and/or Contract are under development or review Project APD, RFP, and/or Contract are in procurement status Materials/Documentation are proprietary and/or copyright-protected Materials/Documentation may present conflicts of interest Materials/Documentation may contain sensitive security, data, testing, and/or PHI information, or may expose program vulnerabilities</p>	
6.	State Officer drafts an email, attaching materials in response to FOIA request	<p>State Officer drafts email, attaches materials responding to FOIA request, and includes the following within the body of the email:</p> <p>If materials/documentation are releasable, email should contain the following language: "Attached is the information in response to the FOIA request with SWIFT ID number XXXXXX."</p> <p>If materials/documentation are not releasable in accordance with Step 5B above, email should contain the following language and regulatory citations**: "Attached is the information in response to the FOIA request with SWIFT ID number XXXXXX. The materials/documentation <u>is not recommended for release</u> due to the sensitive nature of state procurement, contractual, budget, and vendor-proprietary information. The documentation is sensitive to disclosure, and may provide an unfair advantage to vendors during a competitive procurement process, which protects trade secrets and commercial or financial information</p>	State Officer

		<p>that could harm the competitive posture or business interests of a state and/or company, per regulations and the Attorney General memo specified below. In addition, release of the documentation may pose risks to system and data security, and expose program vulnerabilities.”</p> <p><i>**In the body of the email, reference the specific regulatory citations and Atty General memo language detailed in the <u>Regulatory Authority and Standards</u> section of this SOP.**</i></p> <p><i>See example email.</i></p>  <p>Example Email FOIA Request.msg</p>	
7.	State Officer obtains Manager’s clearance/approval before emailing FOIA response to DSG Front Office, and uploading materials to folder on OSG SharePoint site	State Officer sends draft email package to MES Manager to obtain approval for release to DSG Special Assistant, and uploads materials to the dedicated folder on OSG SharePoint site. The Manager also updates the MES Escalation Tool item specific to FOIA request, documenting approval for release to DSG Front Office.	State Officer MES Manager
8.	State Officer sends email containing FOIA response materials and language addressing releasability to DSG Special Assistant (see example email below)	<p>State Officer issues email to the DSG Special Assistant containing FOIA response materials, and notes materials have also been uploaded to the dedicated folder on the OSG SharePoint site. The email also includes the <u>grade of the State Officer</u> who performed the records search, and the <u>number of hours</u> it took to complete the records search.</p> <p>State Officer copies MES leadership team on the email.</p>	State Officer

The release of this sensitive material is guided by the following regulations and standards:

45 CFR PART 5 – FREEDOM OF INFORMATION REGULATIONS	https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-5
SUBPART C – EXEMPTIONS TO DISCLOSURE	<u>45 CFR 5.31 – c and d, what are the reasons records may be withheld?</u>
SUBPART D – CONFIDENTIAL COMMERCIAL INFORMATION	<u>45 CFR 5.41 – How does a submitter identify records containing confidential commercial information?</u>
FEDERAL ACQUISITION REGULATION 3.104 Procurement integrity	https://www.acquisition.gov/far/3.104
ATTORNEY GENERAL MEMO	FREEDOM OF INFORMATION ACT GUIDELINES

EVV SOP

Standard Operating Procedure for Policy Review of Advanced Planning Documents for Electronic Visit Verification in accordance with Section 12006 of the 21st Century Cures Act

Background:

The EVV team reviews EVV APDs for policy changes to them, they do not review when the state is solely requesting additional funding requests. If you're unsure of whether an EVV APD warrants contractor review, the EVV team is happy to review and confirm if it does or doesn't. Please send the APD to Robert McCarthy if you think it warrants a review and he will forward to the EVV Team.

States must meet Electronic Visit Verification (EVV) system requirements of Section 12006 of the 21st Century Cures Act ("the Cures Act") effective January 1, 2020 and January 1, 2023 for Personal Care Services (PCS) and Home Health Care Services (HHCS), respectively. If the state or a contractor on behalf of the state operates the EVV system as part of a state's Medicaid Enterprise System, the state may be reimbursed through the Advanced Planning Document (APD) prior approval process.

The Centers for Medicare & Medicaid Services (CMS) Data Systems Group (DSG) State Officers (SO) are responsible for reviewing and approving all APDs. CMS' Division of Long Term Services and Supports (DLTSS) has engaged the two Rate Review Contractors ("Contractors") to analyze APD submissions and make recommendations regarding the state's compliance with policy-related provisions of the Cures Act. The following DLTSS staff oversee the Contractors. The Rate Review Contractors will only conduct work including EVV/APD reviews, assist with meetings, etc. if the DLTSS staff below is included in requests and the GTL or COR approves:

- **Anthony Borges Nazari** – The Government Task Lead (GTL) who leads all EVV/APD contract tasks.
- **Angela Murphy** – The Contractor Officer's Representative (COR).
- **Ryan Shannahan & Molly Long** – Leadership providing program direction to the COR and GTL.

Only the COR and GTL are authorized to provide technical direction to the Contractors including initiating/cancelling work, establishing review due dates, sharing any data quality concerns, etc. The Contractor's review does not consider or assess the state's compliance with standards and conditions identified in 42 CFR § 433.112(b) for the state's design, development, and implementation of mechanized claims processing and information retrieval systems used in state Medicaid programs as well as for the ongoing operation of those systems.

Procedures:

1. States submit EVV APDs to the CMS MMIS national mailbox at MedicaidMMIS@cms.hhs.gov for review and approval, copying the CMS national mailbox administrator and the State Officer (SO). Documents may include the following:
 - a. Planning Advanced Planning Document (PAPD) with optional EVV Checklist Attachment
 - b. Implementation Advanced Planning Document (IAPD) with optional EVV Checklist Attachment
 - c. Operational Advanced Planning Document (OAPD) with optional EVV Checklist Attachment
 - d. As-Needed and Annual AN-APD/APD Updates with optional EVV Checklist Attachment
 - e. Other documents such as Requests for Proposals (RFPs), signed or unsigned contracts, contract modifications or Memorandums of Understanding (MOU)
 - f. Any other documents submitted by the state, as necessary
2. The CMS national mailbox administrator confirms the APD includes EVV as part of the submission before forwarding the APD EVV review request to the appropriate State Officer, CMS COR¹ and GTL² by the second business day of the APD submission.
3. The CMS COR and GTL will forward the EVV APD review request via email to the appropriate Contractor team based on the state distribution assignment, indicated in Attachment A. The review request email will identify the state, SO, and all relevant APD documents for review.
4. The Contractor will confirm receipt of all necessary review information one business day from the date of CMS COR and GTL email request of EVV APD review.
 - a. If the Contractor identifies an organizational or staff conflict of interest (COI) that cannot be adequately mitigated, it will notify CMS COR, GTL, and the other Contractor via email for reassignment to the other Contractor one business day after the APD submission. The CMS COR and GTL will track Contractor assignments and determine if adjustments in assignment of EVV APDs between the Contractors may be warranted.
5. The Contractors will submit the EVV APD Review Report to the CMS COR and GTL within 10 calendar days from the receipt of the review request. If the EVV APD documentation does not include updates within the scope of Contractor reviews, the Contractors will alert the CMS COR and GTL within this time period that the APD does not warrant Contractor review.

¹ Angela Murphy: angela.murphy@cms.hhs.gov

² Anthony Borges Nazari: anthony.borgesnazari@cms.hhs.gov

6. The Contractors will submit a tracking tool as part of the monthly reporting process to show the number of assigned EVV APD reviews and the status of each review to the CMS COR and GTL.
7. The Contractor will complete the review using the CMS approved EVV APD Review Tool. The Review Tool will guide the Contractor's review of the state's APD submission with the Cures Act. Findings will be categorized as follows:
 - a. **Tier 1 (T1)** – Critical element requiring state APD to affirmatively address. APD submissions failing to meet any of the T1 questions will be identified by the contractor who will identify specific questions directly related to the issue identified to the CMS COR, GTL, and MMIS Analyst for issuance of a Request for Additional Information (RAI) by the Regional Office which will stop the processing clock until the response is received and processing can continue. The RAI may include Tier 2 & 3 issues.
 - b. **Tier 2 (T2)** – Priority element for state APD to address. Lack of inclusion warrants follow-up communication with state to solicit clarification and/or additional information. The contractor will identify specific questions directly related to the issue identified to the CMS COR, GTL, and MMIS Analyst for issuance of a Request for Additional Information (RAI) which will stop the processing clock until the response is received and processing can continue.
 - c. **Tier 3 (T3)** – Element identified in the state's APD that may be used to inform CMS' technical assistance activities (this does not impact approval).
8. The Contractor will submit the EVV APD Review Tool populated with the Contractor's review findings in conjunction with a written analysis of initial findings on the policy elements of EVV implementation to the CMS COR, GTL, and SO identified in the EVV APD assignment email no later than 10 calendar days after the receipt of all necessary information to complete a requested review. Using the CMS-approved report template, the Contractor will identify areas of state deficiency with minimum criteria and provide recommendations for additional clarification and/or submissions by the state. CMS COR, GTL, and SOs will receive a report organized by minimum criteria and tier level, and will highlight:
 - a. Any T1 requirements not fulfilled and requiring state response;
 - b. Any T2 requirements that were not fulfilled and requiring follow-up with the state to solicit clarification and/or additional information;
 - c. Any T3 items that should be highlighted as a suggested practice element;
 - d. Any additional recommendations or suggested practices not mentioned in above criteria.
9. CMS SOs will incorporate comments from the Contractor's APD review into applicable informal and formal RAIs to the state.
10. CMS SOs will forward the state's additional information submission to the Contractors for review. Upon receipt of the additional documentation, the Contractor has seven calendar days to submit an analysis of the additional information to determine if the documentation addresses the findings

from the initial report. The CMS COR/GTL may request an expedited review if necessary based on the time available to complete the review.

11. CMS is responsible for communicating the EVV APD review findings to the state. If CMS SOs require the Contractor to attend a conference call with a state regarding EVV APD review, CMS SOs will contact the CMS COR, GTL, and Contractor to schedule a teleconference. In communications with a state regarding the APD, Contractors will provide technical assistance to CMS rather than direct recommendations to the state.
12. CMS will make a final determination to approve or deny the state's EVV APD using the existing APD clearance process. The CMS SO will submit a copy of the formal approval notice to the CMS national mailbox administrator. The Contractor will record the final disposition of CMS' APD determination in the APD tracking tool within two business days of CMS notice.
13. As requested by the CMS COR/GTL, the Contractor will conduct policy review of states' annual APD updates to the extent the updates involve changes to sections related to any EVV elements subject to review by the Contractors' Rate Review Contractor review of states' annual updates of EVV APD will mirror the policy review process of initial submissions and will be completed in 10 calendar days of receiving all the necessary documents from the CMS COR/GTL.

Attachment A: State Assignments for EVV APD Reviews

The following table indicates the state assignments for Rate Review Contractors:

Region	Contractor 1 Lewis & Ellis	Contractor 2 Korn Ferry
1	CT, MA, RI, VT	ME, NH
2	NJ, PR	NY, USVI
3	DC, DE, MD, PA, VA, WV	-
4	FL, SC, TN	AL, GA, KY, MS, NC
5	IN, MI, OH, WI	IL, MN
6	LA, NM, TX	AR, OK
7	MO	IA, KS, NE
8	UT	CO, MT, ND, SD, WY
9	CA, HI, NV, GU	AZ, CNMI, AS
10	AK, OR	ID, WA
Total States	30	26

Change Table History

Date of Change	Change Made By	Description of Change	Version Change Release
10/16/2023	MITRE	<p>Incorporated suggested updates to the MES SOP:</p> <ul style="list-style-type: none"> Added Change History Table Added guidance to include dates when updating status memo field. Added temporary reassignment of decision packages process to ensure UWF decision packages are processed within the required approval timelines in the event of extended SO absence. Added language specifying use of calendar days with regard to MMIS and E&E APD, Contract, and RFP decision package approvals, ensuring use of full 60-day window. Added clarification for use of Submission Date value for UWF decision package naming convention vs Acknowledgement Date value for calculating 60th day. <p>Incorporated additional guidance to describe why actions/steps are needed.</p>	
11/16/2023	MITRE	<p>Updated Emergency IT FFP Requestion section:</p> <ul style="list-style-type: none"> Corrected references of Submission Date field to Acknowledgement Date field in UWF record when creating the decision package. Fully expanded “ADP” to include “(automatic data processing)”. <p>Corrected link for the DSS/DHM COVID-19 tracker to point to new DSG MES SharePoint site.</p>	
11/21/2023	LP	<p>Updated acquisition checklist</p> <ul style="list-style-type: none"> Added you must check with leadership first before 	

		allowing a state to use the Acquisition Checklist.	
11/30/2023	CS	State Officer coverage language added.	
12/6/2023	LP	Added Provisional Approval to the SOP	
01/10/24	CS	Updated naming convention to the date of submission and the acknowledgment date starts the 60-day clock.	
01/24/24	MITRE	<ul style="list-style-type: none"> Removed the Streamlining Modular Certification section. Updated TOC to reflect section removal. <p>Added language throughout the SOP codifying requirements to update the status memo field in all applicable sections and actions in the SOP.</p>	
1/25/24	LP	<ul style="list-style-type: none"> Merged Temporary Reassignment of Decision Packages and state officer coverage Archive HITECH SOP Clean up FOIA SOP Removed Transformed Medicaid Statistical Information System (T-MSIS) Criteria for Enhanced Funding 	
3/19/24	LP	<ul style="list-style-type: none"> Add Team Lead QC Removed director needs to be cc'd on email for formal submission Removed HITECH info Fixed the mailbox admin section Fixed Acquisition checklist section, removed old checklist Removed TMSIS Compliance SOP and adding it Wiki Updated Cost Allocation section 	

