

Enterprise Objective Monitoring and Control Services

Change Management Plan Aid

V1.1



GOVERNMENT OF PUERTO RICO

Department of Health
Medicaid Program

Submitted by:

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Revision History

The Puerto Rico Medicaid Program’s (PRMP) Program Management Office (PgMO) will store the approved Change Management Plan Aid and any approved revisions on the PgMO SharePoint site or in an alternative location specified by PRMP. PRMP and the PgMO will make the plan available to project stakeholders as needed. Currently, BerryDunn provides PRMP PgMO services.

Table 1 presents the revision history for this document. When changes occur, the PRMP PgMO will increment the version number and the date. The PRMP PgMO will record the name of the person or entity making the change and a description of the change in the revision history.

Table 1: Revision History

Date	Document Version	Description	Author(s)
6/22/2022	V1.0	Initial delivery	BerryDunn PgMO Team
8/16/2022	V1.1	Updated 3.4 Perform CR Analysis Section	BerryDunn PgMO Team

1.0 Introduction

The PRMP is committed to the implementation of successful projects for the residents of Puerto Rico and has established a Puerto Rico Medicaid Enterprise Systems (PRMES) PgMO to provide guidance, support, and oversight for vendor projects within the Medicaid Enterprise.¹ The PRMP PgMO has created plan aids to assist with completing projects effectively and efficiently. Project management involves applying best practice processes, tools, and techniques. The PRMP PgMO plan aids provide guidance for delivering more predictable and consistent plans, processes, and practices, which will result in meeting the goals and objectives of PRMP and vendor partners, as well as meeting stakeholder expectations.

The Change Management Plan Aid is a living document intended to provide PRMP vendors with guidance on the PRMP’s expectations regarding project change management. The PRMP expects vendors to develop and submit a Change Management Plan for the project(s) for which they are providing services. Vendors should reference this document when creating their Change Management Plans to help ensure compliance with the PRMP’s expectations and a common understanding between the PRMP and the vendor regarding change management. The PRMP PgMO will update this Change Management Plan Aid when new applicable standards (or versions of a standard) are released or when there are changes to PRMP policies that affect change management.

If a vendor finds a contractual conflict with guidance provided in this plan aid, vendors should defer to their contract and/or any updated PRMP guidance.

The Introduction section of this document provides information on the Change Management Plan Aid’s purpose and objectives, scope, standards, assumptions, dependencies, and constraints. To help ensure an understanding of project change, Table 2 provides definitions for baseline, change, change control, Change Request (CR) Log, Change Management Plan, Configuration Management Plan, and CR.

Table 2: Change Definitions

Term	Definition
Baseline	The approved version of a work product that can be changed only through formal change control procedures and is used as a basis for comparison to actual results
Change	A modification to any formally-controlled project deliverable, project management plan component
Change Control	A process where modifications to documents, deliverables, or baselines relating to the project are identified, documented, approved, or rejected

¹ In this aid, “vendor” refers to vendors that implement and maintain systems within the PRMES, as well as contractors and other entities that provide non-solution-related PRMES services to PRMP.

Term	Definition
CR Log	A comprehensive list of changes submitted during the project and their current status
Change Management Plan	A component of the Project Management Plan (PMP) that establishes the Change Control Board (CCB), documents the extent of its authority, and describes how the change control system will be implemented. Change management is focused on the change control process rather than the specific items that will be subject to the change control process
Configuration Item	A subset of service asset that has a direct impact on service delivery and needs to be managed in order to deliver a product or service. These items of the project are identified as items that will be recorded and updated through a formal change control process, so that the product of the project remains consistent and operable. Examples of configuration items include software and applications, locations and offices, employees and customers, documentation, hardware and changes
CR	A formal proposal to modify a document, deliverable, or baseline

1.1 Purpose and Objectives

The purpose of the Change Management Plan Aid is to provide guidance for processes and standards for the management of change throughout the PRMP projects. Through this process, the PRMP’s vendors should establish an orderly and effective procedure for tracking submission, coordination, review, evaluation, categorization, and approval for release of all changes to the project’s baselines.

The objectives of the Change Management Plan Aid are to:

- Provide guidance to the project-specific vendors in the development of their Change Management Plans. The project-specific plans should demonstrate the vendor’s process for managing changes in alignment with the guidelines described in the Change Management Plan Aid.
- Describe the vendor’s recommended process to manage and perform change control for managing change to configuration items related to documents and requirements as applicable.
- Define a process to facilitate communication among PRMP stakeholders and minimize uncertainty around the existence and outcome of a change.
- Establish change management consistency across all PRMP PRMES projects and initiatives.

The Change Management Plan Aid primarily provides guidance for vendors to develop and implement a Change Management Plan. These processes are defined in detail in the Change Management Process, CR, and Reporting sections of this document.

1.2 Scope

The scope statement defines both the work included and the work not included in the scope of a project. For purposes of this PgMO Change Management Plan Aid, this section addresses what is in scope and out of scope for an anticipated plan. The aid provides guidance to vendors on addressing processes and procedures related to managing and controlling submitted changes for PRMP projects.

1.2.1 In Scope

Vendors should identify all the items subject to change management as part of the overall project. This pertains to the entirety of the project and includes all changes that impact scope, schedule, and cost. Additional items that are known to impact the configuration items without necessarily impacting the scope, schedule, and cost are also considered to be in scope. The following is a representative list of areas that may undergo change leading to a CR:

- Scope
- Time
- Duration
- Cost
- Resources
- Deliverables
- Product
- Process
- Quality
- Configuration
- Processes to manage the project life cycle, including federal certification if applicable

1.2.2 Out of Scope

For purposes of providing guidance to vendors, this Change Management Plan Aid does not include operation updates that are part of operational changes to the product or project services and are considered to be out of scope of the Change Management Plan.

Vendors should list the items considered out of scope. Any scope exclusions must be in alignment with the request for proposals (RFP), vendor's proposal, and the final signed contract as necessary.

1.3 Approach

This section describes assumptions, dependencies, constraints, standards, and references. The Change Management Plan takes into consideration the assumptions, dependencies, and constraints for the system implementation projects as described in this section.

1.3.1 Assumptions

Per the *Guide to the Project Management Body of Knowledge® (PMBOK® Guide)*, an assumption is a factor expected to be in place or to be in evidence. The following are assumptions considered in the development of the Change Management Plan Aid and are applicable to all PRMP projects:

- Changes to configuration items in the projects are managed using the processes and procedures defined in the Change Management Plan.
- The vendor will have a documented process to identify and account for project artifacts under configuration control (a Configuration Management Plan), and how to record and report changes to them.
- Changes of a contractual nature are managed through the guidelines defined in the change control process, which is also dependent on procurement management plan processes.
- The vendor will have regularly-scheduled change control meetings.
- PRMP PRMES projects are expected to follow this plan aid for uniformity.
- Stakeholders initially assigned to the CCB could be replaced throughout a project, and adjustments should be made as needed.
- PRMP will have a complementary risk and issue management process overseen by PRMP Project Leads and supported by the PRMP PgMO.

1.3.2 Constraints

Per the *PMBOK® Guide*, a constraint is a limiting factor that affects the execution of a project or process. The Change Management Plans developed by vendors should conform to the Change Management Plan for managing changes. Scope, schedule, and cost are constrained by the changes and should be managed using the change control process.

1.3.3 Dependencies

Per the *PMBOK® Guide*, a dependency is a logical relationship between two activities, or between an activity and a milestone. For example, an activity that cannot begin until another activity has been finished has a dependency. This Change Management Plan Aid has dependencies on plans including, but not limited to:

- **Configuration Management Plan:** The Configuration Management Plan defines and documents configuration items that are subject to the integrated change control process, including items such as requirements, deliverables, and project schedules.
- **Quality Management Plan:** The Quality Management Plan documents the necessary information required to manage project quality from project planning to delivery. It defines a project's quality policies, procedures, criteria for and areas of application, along with roles, responsibilities, and authorities.
- **Procurement Management Plan:** The Procurement Management Plan describes how a project team will acquire goods and services from outside of the performing organization.
- **Requirements Management Plan:** The Requirements Management Plan includes requirement identification, validation, design, verification, and implementation, along with controlling changes to a requirement and communication to stakeholders as a continuous process throughout a project. It also includes identification of the standards and processes for developing backward and forward requirements tracing, individually or collectively, throughout the life cycle of a requirement.
- **Schedule Management Plan:** The Schedule Management Plan defines the processes required to manage timely execution of the work needed to complete a project.
- **Scope Management Plan:** The Scope Management Plan includes two components:
 - Product scope is a collection of functions and features that characterize a product, service, or result.
 - Project scope is the work performed to deliver the product, service, or result with the specified functions and features.

1.3.4 Standards and References

This section provides an initial list of standards and references applicable to the Change Management Plan. Per the *PMBOK® Guide*, a standard is a document established by an authority, custom, or general consent as a model or an example. A reference is a source of information and context.

The PRMP PgMO and PRMP vendors are required to use the appropriate standards and references. The PRMP PgMO and PRMP vendors might incorporate additional standards and references if appropriate for the plan content.

Vendors should develop a Change Management Plan based on this plan aid and using the following industry standards:

- *A Guide to the Project Management Body of Knowledge (PMBOK®), Sixth Edition*, Project Management Institute®, Chapter 4.6 Perform Integrated Change Control
- *ISO 27001 Security – Change Management and Control* © 2007 (International Organization for Standardization)

- *Centers for Medicare & Medicaid Services Policy for Change Management v1.0*

Vendors are expected to monitor applicable standards and industry best practices. Vendors should work with the PRMP to determine if updates are required to their Change Management Plans when a new applicable standard (or version of a standard) is released.

2.0 Roles and Responsibilities

This section describes the primary roles and responsibilities of the groups that consist of the project staff, sponsors, and stakeholders as they relate to change management. Table 3 illustrates which stakeholders are responsible (R), accountable (A), consulted (C), and informed (I) (RACI), defined as:

- **Responsible:** This stakeholder does the work to complete the task area. This stakeholder may also serve as an Accountable stakeholder for some task areas.
- **Accountable:** This stakeholder delegates work and is the last one to review the task area before it is deemed complete. According to best practice, one stakeholder (or the lowest number possible) should be deemed Accountable.
- **Consulted:** This stakeholder provides input based on how the task area will impact the future work of the project and the stakeholder’s expertise.
- **Informed:** This stakeholder should be aware of the progress associated with the task area.

Table 3 aims to provide insight into how PRMP and the PgMO will interact with project change management processes and responsibilities. The vendor should propose its own stakeholder groups and RACI matrix according to its team’s organizational structure. Table 3 provides vendors with the RACI matrix for PRMP and/or PgMO responsibilities. Vendors may edit this baseline matrix if deviations are discussed and agreed upon with the PRMP and PgMO to determine what is appropriate for the project.

Table 3: RACI Matrix for Project Change Management

Task Area	CCB	PRMP Leadership	PRMP Program Director	PRMP PgMO	PRMP Project Lead	Vendor
Identify Change	I	I	I	C	A	R
Create Change	I	I	I, C	C	A	R
Assign CR Owner	I	I	I, C	I, C	A	R
Perform CR Analysis	I	I	I	I, C	A	R
Present CR to CCB	C	C	C	I, C	A	R
Update CR Log and Report	I	I	I	C	A	R

The following subsections provide a description of each stakeholder group.

2.1 CCB

The CCB is a governance committee under the Executive Steering Committee that is important to the change management process. The CCB reviews CRs and then decides whether to approve, reject, or put CRs on hold. To review CRs, members of the CCB must analyze the requested change and its impact on the project constraints such as the schedule, budget, other configuration items, and ultimately, additional projects within the PRMP PRMES. Therefore, it is important that the CCB include representation that is supported by stakeholders with ownership and understanding of the process.

The CCB typically constitutes members with voting and non-voting rights. The voting members are those members or designees who vote to authorize or reject the CR on behalf of the division they represent. Non-voting members play a vital role as subject matter experts (SMEs) to provide support to the CCB in the deliberations of CR reviews and to help the CCB make informed decisions about requested changes.

Most projects will identify a separate CCB to oversee the changes submitted and governed by a corresponding CCB charter. The charter defines membership and authority within that specific CCB. The PRMP PgMO, as defined in the roles and responsibilities section of the Change Management Plan Aid, supports each CCB.

2.2 PRMP Leadership

PRMP is the Medicaid agency responsible for administering the Medicaid Program in Puerto Rico, including the Children's Health Insurance Program (CHIP), and a waiver-based section 1915(a) program. PRMP is an agency within the Puerto Rico Department of Health (PRDoH). While leadership roles might vary between projects, in general, the PRMP leadership stakeholder group refers to the PRDoH Secretary, PRMP Executive Director, and the PRMP Executive Steering Committee.

2.3 PRMP Program Director

The PRMP PRMES Program Director is a member of the PRMP PgMO.

An important aspect of the PRMP Program Director's role is to set expectations and approve processes for change among the PRMES projects.

2.4 PRMP Project Lead

PRMP appoints a Project Lead to oversee each of the PRMES projects under the PRMP programs utilizing the defined PRMP PgMO processes. The Project Lead collaborates with the vendor's Project Manager to help ensure the project execution and implementation is in accordance with the approved schedule and processes defined by the PRMP PgMO.

The PRMP Project Lead will have joint responsibility with the vendor Project Manager (PM), and the PRMP PgMO, to be the initial implementers of the change management processes defined in this plan.

The PRMP Project Lead will have joint responsibility with the vendor Project Lead for defining, developing, monitoring, controlling, and verifying change.

2.5 PRMP PgMO

PRMP has designated the PgMO to provide program management guidance and collaborative oversight for its information technology initiatives. As part of this responsibility, the PRMP PgMO has developed this Change Management Plan Aid as a guide for project-specific Change Management Plans.

Each vendor should create an individual Change Management Plan to manage project quality and should collaborate with the PRMP PgMO to gain approval of their process.

2.6 Vendors

The vendors supporting PRMP in one or more information technology projects or supporting other PRMP activities are responsible for developing a project-specific Change Management Plan, obtaining PRMP and PRMP PgMO approval of the plan, and managing change in accordance with that plan. The vendor Project Manager is responsible to further elaborate and divide its team into stakeholder groups in this section.

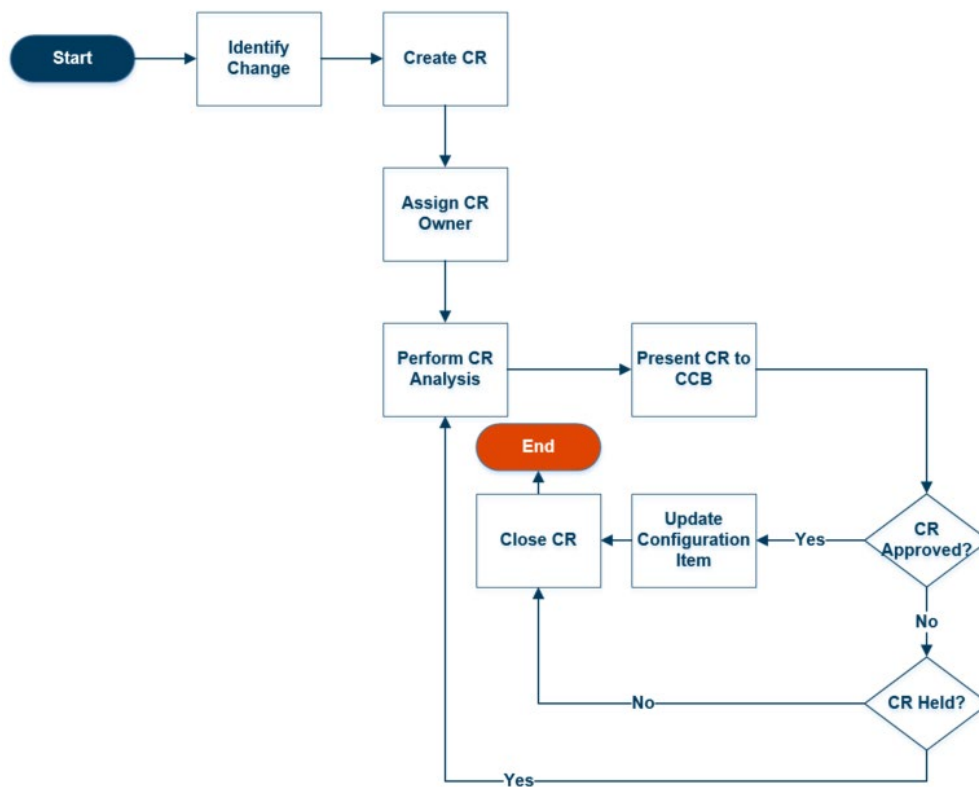
In accordance with the assumptions described in this document, the PRMP anticipates that vendors will manage change according to their PRMP-approved Change Management Plan. The vendor Project Manager will have joint responsibility with the PRMP Project Lead for defining, developing, monitoring, controlling, and verifying change.

3.0 Change Management Process

The vendor is responsible for developing a Change Management Plan for each project the vendor implements. The PRMP PgMO Change Management Plan should be referenced for alignment with the process, procedures, communication, and collaboration among the CCB, PRMP leadership, PRMP Program Director, the PRMP PgMO, and PRMP Project Lead. The plan should also include the expectations for the timeframe each priority level of change would be introduced and addressed along each step of the change management process.

The basic flow for the change control process presented in Figure 1 provides a recommended change control process for project vendors:

Figure 1: Change Control Process



3.1 Identify Change

The first step in the change management process is to identify the need for a change and communicate it to the vendor Project Manager and PRMP Project Lead. Anyone on the project team can identify the need for change reviews with their immediate supervisor or Project Manager, which leads to creation of a CR.

3.2 Create CR

A proposed change is identified, it is analyzed by the vendor Project Manager for initial qualification on the impacts and is submitted to the PRMP Project Lead. The Project Lead reviews the change item and, if in agreement with the information provided, the vendor Project Manager creates a CR and makes an entry into the CR Log. If additional information is needed, the request is made prior to logging the CR. Whenever a CR is posted, information related to the CR is included in the CR Log (see Table 4: CR Attributes). The final part of this step is to share the CR and CR log with the PRMP Program Director and the PRMP PgMO as they may assist later steps in the CCB process.

3.3 Assign CR Owner

When a change is identified and the CR is logged, the PRMP Project Lead assigns the CR owner. The vendor CR owner, or point person, takes responsibility for analyzing the impact of the change, reviewing the analysis with the PRMP Project Lead, following up on the implementation of the change, and communicating the status of the change to the PRMP Project Lead and the PRMP PgMO.

3.4 Perform CR Analysis

The CR owner is responsible for analyzing the CR and estimating the effort needed to implement the change. The assessment includes the impacts to the project in the areas such as scope, quality, security, schedule, resources, and costs being done at the time versus later or not implementing the change. For instance, a CR could be created for a change in functionality to address new regulations or policies. This CR may require updates to the requirements, design documents, system code or functionality, and system infrastructure. To understand the full scope of the change, the CR owner should work with the business analysts and development and infrastructure teams to assess the full scope of change. The CR owner should also work with the PRMP Project Lead and vendor Project Manager to determine the impact the change may have on the project schedule and further collaborate with the PRMP PgMO and PRMP Program Director to help ensure other Medicaid systems are not affected by the proposed change. The CR owner should also work with the PR Medicaid Security staff to complete a Security Impact Assessment. A Security Impact assessment should be completed for every CR, as required by CMS.

3.5 Present CR to CCB

After completing a thorough analysis of the requested change, the CR owner presents the CR to the PRMP Project Lead for submission to the CCB. As part of the process, the CR should be communicated to the CCB members and the PRMP leadership for awareness. This allows an opportunity to convene a meeting based on the priority of the CR. The goal of this communication is to provide CCB members time to understand and question the nature, need, and impact of the change ahead of the meeting. Ultimately, this allows CCB members to be prepared to discuss and provide approval decision regarding the CR in the CCB meeting.

After the CR is presented to the CCB, the CCB members deliberate on the change, and then voting members cast their vote for approval, denial, or hold status of the CR. If the CCB voting members choose, this vote may be a closed vote where only voting members of the board are present. In the case of approval, the CR is moved to the next step of implementing the change. If the CR is denied, then it moves to the step of closure. If the CCB votes to put a CR on hold, then the CR is moved to the step of performing analysis in addition to the original analysis, or—in some instances—transitions into a holding pattern until a triggering event arises.

The CCB may vote to place a CR on hold for a variety of reasons including allowing more time for analysis based on questions raised in the CCB. In this case, additional analysis should be completed for the CR to be re-presented at the next CCB meeting.

Another reason for voting to place a CR on hold is that the change is not time sensitive. In this case, the CR moves back to the perform analysis process because passage of time might affect the analysis of the CR impact.

3.6 Update Configuration Items

Approved CRs are moved to the update configuration items step. In this process, the assigned CR owner updates the configuration items or manages the updates to those configuration items. The updates to configuration items usually include updates to the project schedule and requirements to account for additional/reduced tasks and scope. Additionally, other documents, system code, and infrastructure components may require updates as defined in the CR.

Throughout the implementation of the CR, the CR owner maintains the responsibility for communicating the status of the implementation to project stakeholders, the PRMP Program Director, PRMP PgMO, and PRMP leadership, as well as updating the CR Log to reflect progress on the implementation. Once implemented, the CR owner marks the CR as complete and requests closure from the PRMP.

3.7 Close CR

If the CCB votes to deny a CR, the vendor closes the CR with a description indicating the date of the decision and details from the CCB outlining the reason that the request was denied (see Table 4 -CR Attributes).

Changes in scope may, in some instances, trigger a contract change; however, these changes are not included in the scope of the Change Management Plan. If this type of change occurs, the change status will be marked as “Held for Future Consideration.” The CCB and Executive Steering Committee will then discuss the need for changes to the vendor contract. If the CCB votes to approve a CR, the CR Log is updated, and the changes are included in the appropriate project implementation phase.

After the CR owner implements the change, the CR owner provides the PRMP Project Lead, PRMP Program Director, and the PRMP PgMO with documentation stating the status of the CR is complete. The PRMP Project Lead reviews the update and, if needed, provides feedback. The vendor Project Manager updates the CR Log, and marks it as completed upon receiving approval from the PRMP or its designee. Review of the implementation information is intended to

help ensure that the CR was implemented correctly and no additional changes were made. Once this verification occurs, the vendor creates a new baseline for each configuration item and their associated relationships to reflect that the item has a new baseline. After the baseline(s) are complete, the vendor closes the CR.

Regardless of whether the CR closes after a denial or after the implementation is completed, the vendor sends out a communication on the status of the CR in the status meetings.

After the CR is closed, the CR process is complete.

4.0 CR Log and Reporting

This section defines the CR Log attributes, attribute descriptions required to log a CR. This section also describes the monitoring and reporting requirements for CRs.

4.1 CR Log Attributes

When developing a new CR, several identifying attributes should be gathered, documented, and input to the CR Log. The vendor should create, track, and maintain a CR Log that includes, at a minimum, the attributes in Table 4.

Tracking and maintaining the CR is based on the processes and procedures set forth in the Change Management Plan, Section 3 – Change Management Process.

Table 4: CR Attributes

CR Attribute	Description
CR Identification Number	Sequential system-generated number to identify the CR
CR Title	Brief sentence or phrase summarizing the change presented
CR Status	Indicates the CR status. CR status indicators are: <ul style="list-style-type: none"> ▪ Open ▪ Ready for CCB review ▪ Held for future consideration ▪ In implementation ▪ Completed ▪ Closed ▪ Canceled/Denied
Creation Date	Date CR was originally identified
CR Owner	Name of the person responsible for seeing the CR through to conclusion
CR Description	Detailed definition of the project change, including, but not limited to: <ul style="list-style-type: none"> ▪ Description of the proposed change ▪ Justification why proposed change should be implemented ▪ Impact if not implementing the change ▪ Name of the person identifying the request or the meeting originating the request
Project Assigned To	Vendor and Project Name
Change Impact	<ul style="list-style-type: none"> ▪ Documents the full impact of the change, including schedule and cost, if applicable ▪ Documents the configuration items that need to be changed as a result

CR Attribute	Description
	<ul style="list-style-type: none"> ▪ Documents the impact to other projects and systems in operation <p>Note: change impact information may be provided as an attachment to the CR and noted as such in the Change Impact attribute</p>
Notes/Updates	To capture notes and/or updates during the life cycle of a CR
Work Estimate (in hours)	<p>Identifies estimated hours by project phase for vendor resources, client resources, and other resource groups that have tasks that should be included for project.</p> <ul style="list-style-type: none"> ▪ Initiation ▪ Planning ▪ Executing ▪ Monitoring and Controlling ▪ Closing ▪ Implementation
Implementation Date	Date projected change is expected to be implemented
CR Approval Date	Date CR was approved and ready for project inclusion
CR Close Date	Date CR is closed

4.2 Change Control Monitoring, Controlling, and Reporting

Vendors should maintain their CRs in separate CR Logs by project for PRMP. The CRs are monitored by the PRMP PgMO and are reviewed for updates in the vendor’s status report.

The CR Log—along with new CRs reviewed and approved during the CCB meetings as they are scheduled—will be monitored and archived in an approved repository. In their individual Change Management Plans, Vendor should describe their repositories and whether they will support PRMP PgMO monitoring through direct access to the repositories, regular meetings, outputs (e.g., reports), or a combination.

Appendix A – Acronyms List

Table 5 presents a list of the acronyms used in this document.

Table 5: Acronyms

Term or Acronym	Definition
CCB	Change Control Board
CHIP	Children's Health Insurance Program
CR	Change Request
EOMC	Enterprise Objective Monitoring and Control
ISO	International Organization for Standardization
KL	BerryDunn KnowledgeLink
OIAT	Oficina de Informática y Avances Tecnológicos
PRDoH	Puerto Rico Department of Health
PgMO	Program Management Office
PMBOK® Guide	<i>A Guide to the Project Management Body of Knowledge®</i>
PMP	Project Management Plan
PRMES	Puerto Rico Medicaid Enterprise Systems
PRMP	Puerto Rico Medicaid Program
RACI	Responsible, Accountable, Consulted, Informed
RFP	Request For Proposals
SME	Subject Matter Expert