PUBLIC CONSULTING GROUP

Solutions that Matter

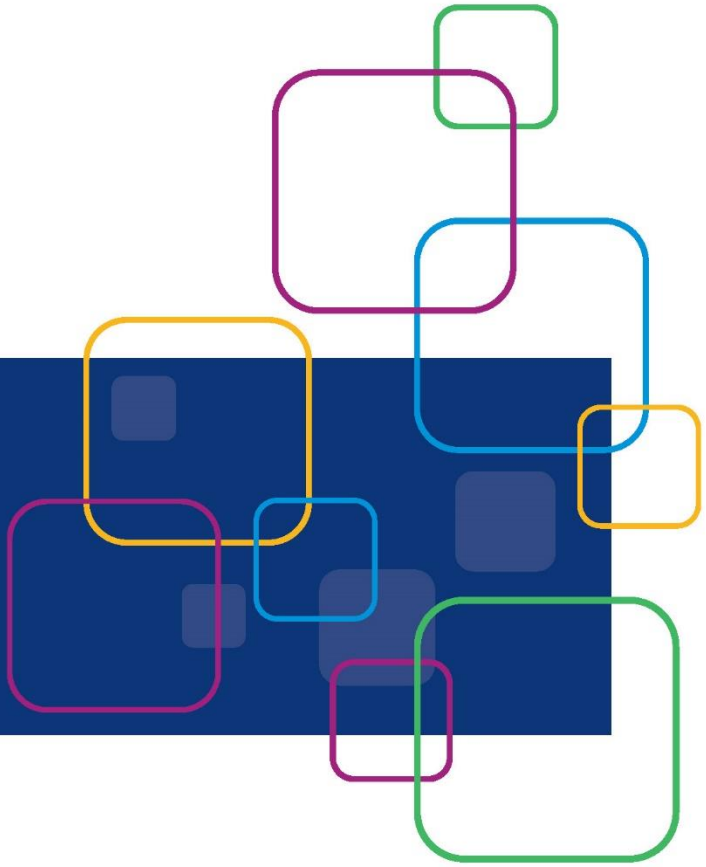
TECHNICAL PROPOSAL

PUBLIC VERSION

Puerto Rico Department of Health

Asset Verification System

RFP #: *2024-PRMP-MES-AVS-005*



October 31, 2024 | 3:00 PM ET

Nereida Montes-Melendez
Puerto Rico Department of Health
268 Luis Muñoz Rivera Ave.
World Plaza – 5th Floor
San Juan, Puerto Rico 00918
Medicaid.procurement@salud.pr.gov

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October 31, 2024

Nereida Montes-Melendez
Puerto Rico Department of Health
268 Luis Muñoz Rivera Ave.
World Plaza – 5th Floor
San Juan, Puerto Rico 00918
Medicaid.procurement@salud.pr.gov

Dear Nereida,

Public Consulting Group LLC (PCG) is pleased to submit the following proposal to Puerto Rico's Department of Health (PRDoH), Puerto Rico Medicaid Program (PRMP) in response to your Asset Verification System solicitation. PCG is confident that the asset verification system (AVS) we are proposing to PRMP is in your best interest because it: (1) is currently operational in 27 states; (2) includes what is easily North America's most comprehensive financial institution network and most comprehensive property database; (3) can be configured to quickly add any of more than 200 other eligibility verification data sources in the future via our API multiplexer; and (4) eliminates the risk associated with hiring an unproven vendor with an unproven system.

As the country's most experienced health and human services (HHS) asset verification services provider, PCG has successfully provided AVS to 30 different HHS agencies, including 27 as a prime contractor. Of these 30 states who are relying on PCG to provide AVS, 23 have so far been in a position where they had the opportunity to either re-award their AVS contract to PCG for a second time or go with another vendor…

…**all 23 of these states re-hired PCG for a second time**.

PCG's team of engineers and subject matter experts are easily the most experienced AVS personnel in North America and our system is being used by more states than all other vendors combined.

Questions or communications regarding this submission may be directed to the following individual:

Peter H. Cheesman
Manager
Public Consulting Group
Phone: (207) 861-1950
Email: pcheesman@pcgus.com

We appreciate the opportunity to present our Asset Verification System to Puerto Rico's Department of Health and look forward to your review of our proposal.

Sincerely,

William S. Mosakowski
President and CEO
Public Consulting Group LLC

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APPENDICES

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1. PROPOSAL SUMMARY

On the following pages, Public Consulting Group LLC (PCG) has described how our asset verification system (AVS), project personnel, and company experience meet and exceed the Puerto Rico Department of Health's Asset Verification System requirements defined in RFP 2024-PRMP-MES-005.

First, we introduce you to PCG, an organization focused on providing "solutions that matter" to public sector agencies since 1986.

[redacted]

Third, PCG articulates our vast AVS qualifications, including successful implementations on behalf of 30 states and dozens of additional eligibility data and verification qualifications.

Fourth, PCG details the relevant experience of the personnel being proposed for this engagement, who are the most experienced AVS personnel in the world by a wide margin.

Fifth, we introduce you to our subcontractors and data providers, each of whom maintain the most comprehensive financial asset, property, and motor vehicle data solutions, respectively, on the market today. We also include references for PCG and each of these subcontractors as further evidence of our qualification.

Sixth, PCG details exactly how our system complies with each of the system functionalities and capabilities required by the RFP.

Seventh, PCG describes the fact that our AVS is housed in an AWS virtual private cloud, deemed FedRAMP moderate, and the native AWS tools PCG employs to ensure the security of sensitive data.

Eight, PCG walks you through how our AVS process works, including submitting requests, obtaining third-party data, evaluating the data against Puerto Rico's specific eligibility policy, and returning the data to Puerto Rico, either via batch, API, and/or within PCG's AVS Web Portal.

Ninth, PCG describes our unmatched AVS financial institution network which includes 97 percent of the financial institutions in Puerto Rico and 99 percent of the financial institutions on the mainland of the United States.

Tenth, PCG details various features and functions of our AVS and the activities associated with implementing and maintaining the system on your behalf, including reporting, turnover planning, performance monitoring, support options, training, maintenance, backup and recovery.

Finally, PCG submits a number of detailed, preliminary plans for Puerto Rico's review, including our Management Plan, Work Breakdown Structure/Implementation Plan, and Operations Plan, and we articulate how we approach project management.

PCG concludes our proposal with a number of appendices further detailing our service, including a detailed description of our AVS Web Portal, currently used by 18 states.

PCG appreciates the opportunity to present the country's most used asset verification system, supported by the country's most experienced asset verification personnel, to Puerto Rico's Department of Health and we look forward to your review of our proposal.

PUBLIC CONSULTING GROUP

Solutions that Matter

October 31, 2024

Nereida Montes-Melendez
Puerto Rico Department of Health
268 Luis Muñoz Rivera Ave.
World Plaza – 5th Floor
San Juan, Puerto Rico 00918

Re: ***Puerto Rico Department of Health Asset Verification System RFP***

Dear Nereida,

Public Consulting Group (PCG) intends to bid on the Puerto Rico Department of Health Asset Verification System Request for Proposal number 2024-PRMP-MES-AVS-005.

We look forward to your review of our proposal.

Sincerely,

William S. Mosakowski
President and CEO
Public Consulting Group LLC

2. EXECUTIVE SUMMARY

Simply put, there are several key differentiators between PCG's AVS and that of our competitors that PRMP should be aware of when selecting your asset verification vendor. These differentiating enhancements, available to PRMP should we be selected as your AVS provider, include:

- **Leading Data** – For this engagement, PCG is proposing to leverage the country's foremost financial asset data provider, Accuity, the country's most comprehensive property data provider, LexisNexis, and the country's leading motor vehicle data provider, TransUnion. Accuity data is used by 48 states and the Social Security Administration to verify financial assets owned by public assistance clients. Further, PCG has partnered with LexisNexis to provide 15 states with access to more than 98 percent of the mortgage, deed, and assessment records in the United States—the most maintained by any vendor in the world. Finally, TransUnion maintains more than 90 percent of the motor vehicle ownership records in the United States, much of which go back 1996. The combination of these three data sources will ensure Puerto Rico can perform the most comprehensive searches for undisclosed assets and the most efficient verifications of disclosed assets.

[redacted]

- **More Comprehensive Asset Searches** – As a no-cost enhancement, PCG is also expanding our national bank search to include up to 32 FIs, more than doubling the number that was previously available (national search previously included 13 FIs). These newly added FIs are regionally significant and will typically respond to asset verification requests within 24 hours. Additionally, because these FIs have been added to the national account search, if no accounts are found, they will not be included in the local FI search portion of the detection process, thus allowing the local geographic search to focus on FIs with a higher probability of holding account information for the benefits applicant.

[redacted]

- **Federally Compliant**: PCG's AVS will support Puerto Rico's compliance with recent Federal guidance regarding the use of reasonable compatibility standards when evaluating resource-based eligibility and the requirement to include AVS in your ex parte renewal process.

[redacted]

Each of these value adding features were developed in concert with other state health and human services (HHS) agencies to support a more flexible, efficient, and comprehensive asset verification service.

Thirty states (and counting) rely on PCG's AVS to process millions of AVS transactions each year. PCG has consistently earned our clients' trust with 99.99+ percent uptime across all of our AVS clients over the past five years. PCG's proposed AVS project managers are by far the most experienced collection of asset and eligibility verification subject matter experts in the country, having spent the past 10 years deploying CMS-compliant asset and eligibility verification solutions on behalf of 30 states. This means that we not only know asset verification, but we also know how to assist our clients in navigating issues and obstacles that are peripheral to asset verification implementations, including obtaining spouse or existing beneficiary authorizations, FCRA compliance, enhanced federal funding, MITA certification, reasonable compatibility, ex parte renewal processing of Aged, Blind & Disabled (ABD) members, how to scale AVS to include additional data sources, and more.

Other vendors may purport to be able to comply with Puerto Rico's requirements. However, PCG is the only vendor who has done so, time and again, for Medicaid agencies across the country, while continuing to innovate with one new AVS enhancement opportunity after another. Simply put, PCG is the only vendor in the United States who can offer Puerto Rico's Medicaid Program a smart, proven, configurable, and scalable

AVS solution that meets and exceeds all of your requirements today and all your future eligibility data requirements for years to come.

3. FIRM / ORGANIZATION INFORMATION

PCG is a leading public sector management consulting, technology, and operations firm that partners with health, human services, and education agencies to help them achieve their goals and objectives. Today, PCG is engaged on **more than 2,000 state and local government projects nationwide** to help our customers develop and enhance technology, maximize resources, make better management decisions using performance measurement techniques, improve business processes, address Federal compliance requirements, and improve client outcomes.

Founded in 1986, PCG has more than 2,000 professionals in 20+ offices worldwide—all committed to delivering solutions that change lives for the better.

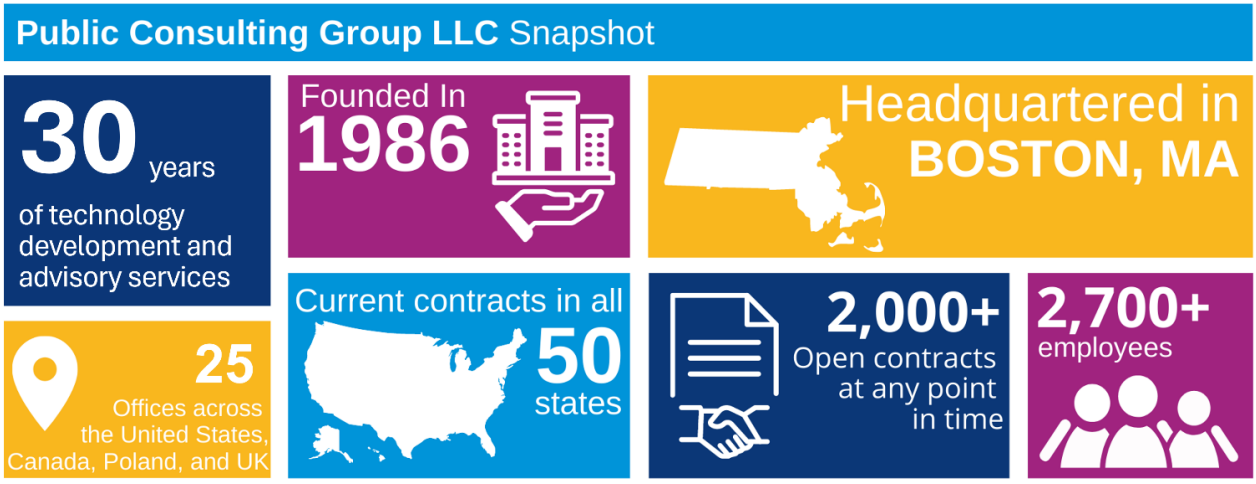


Figure 1.0: PCG is currently operating more than 2,000 state agency and municipal projects in all 50 states. Proven results for the public sector.

3.1 Purpose, Mission, and Vision

Because PCG has been almost exclusively dedicated to the public sector for **more than 35 years**, the firm has developed a deep understanding of the legal landscape, regulatory requirements, technical considerations, and fiscal constraints that often dictate a public agency's ability to meet the needs of the populations it serves.

Solutions that Matter. PCG partners with health, education, and human services agencies to improve lives, including:

Solutions that lead to healthier communities	At PCG, we help our clients meet the financial, regulatory, and operational challenges of today's changing health care landscape so they can provide the best care, most effectively, to the people they serve.
Solutions that impact lives for the better	At PCG, we're committed to helping state and municipal human services and economic development agencies keep their promises to the children, adults, and families they serve—responsibly and sustainably. Together, we're building stronger communities.
Solutions that yield more effective programs	To serve the public effectively and make a positive difference, it's essential to have the right technology solutions and support. At PCG, we provide the full spectrum of technology development and consulting services to help you meet your operational and program needs both today and in the future.
Solutions that create brighter futures	At PCG, we help health plans, providers, and health and human services (HHS) agencies strengthen their performance, streamline their operations, and improve their programs and instruction—so that all constituents will have what they need to succeed.

Figure 2.0: At PCG, we're passionate about getting results for our clients. Because we know that in the public sector, good results mean healthy, empowered, and successful individuals, families, and communities.

Founded in 1986 and headquartered in Boston, Massachusetts, PCG helps primarily state public sector health, education, and human services agencies make measurable improvements to their performance and processes.

Our public sector focus means we have a deep understanding of the challenges our clients face—from economic constraints to demographic shifts to regulatory changes to workforce challenges—and what it takes to surmount them. For more than 35 years, we have helped our clients:

- Maximize resources
- Contain or cut costs
- Make better management decisions
- Streamline their business processes
- Implement and improve their technology solutions
- Improve federal and state compliance
- Optimize client outcomes

Public Consulting Group LLC is a wholly owned subsidiary of Public Consulting Group Holding, Inc.

Areas of Specialization

PCG offers hundreds of products and services across 25 areas of core competency in three categories: Systems, Data, and Technology; Strategy, Design, and Intelligence; and People, Processes, and Management, as illustrated in *Figure 3.0* below.

Systems, Data & Technology

Government's technology needs are unique and focused on outcomes that matter for real people. We offer a full spectrum of cost-effective information technology, data, and development solutions in areas including education, health, human services, finance and administration, workforce development, and more.

- Data Integration, Analytics & Management
- Independent Verification & Validation
- Systems Integration
- Development & Testing
- Technology Solutions & Services

Strategy, Design & Intelligence

Today's challenges require government to meet complex, high-stakes problems with measurable solutions that narrow the margin for error or waste. We are there for clients every step of the way, helping them design winning strategies for implementing a wide range of polices, regulations, processes, and other solutions.

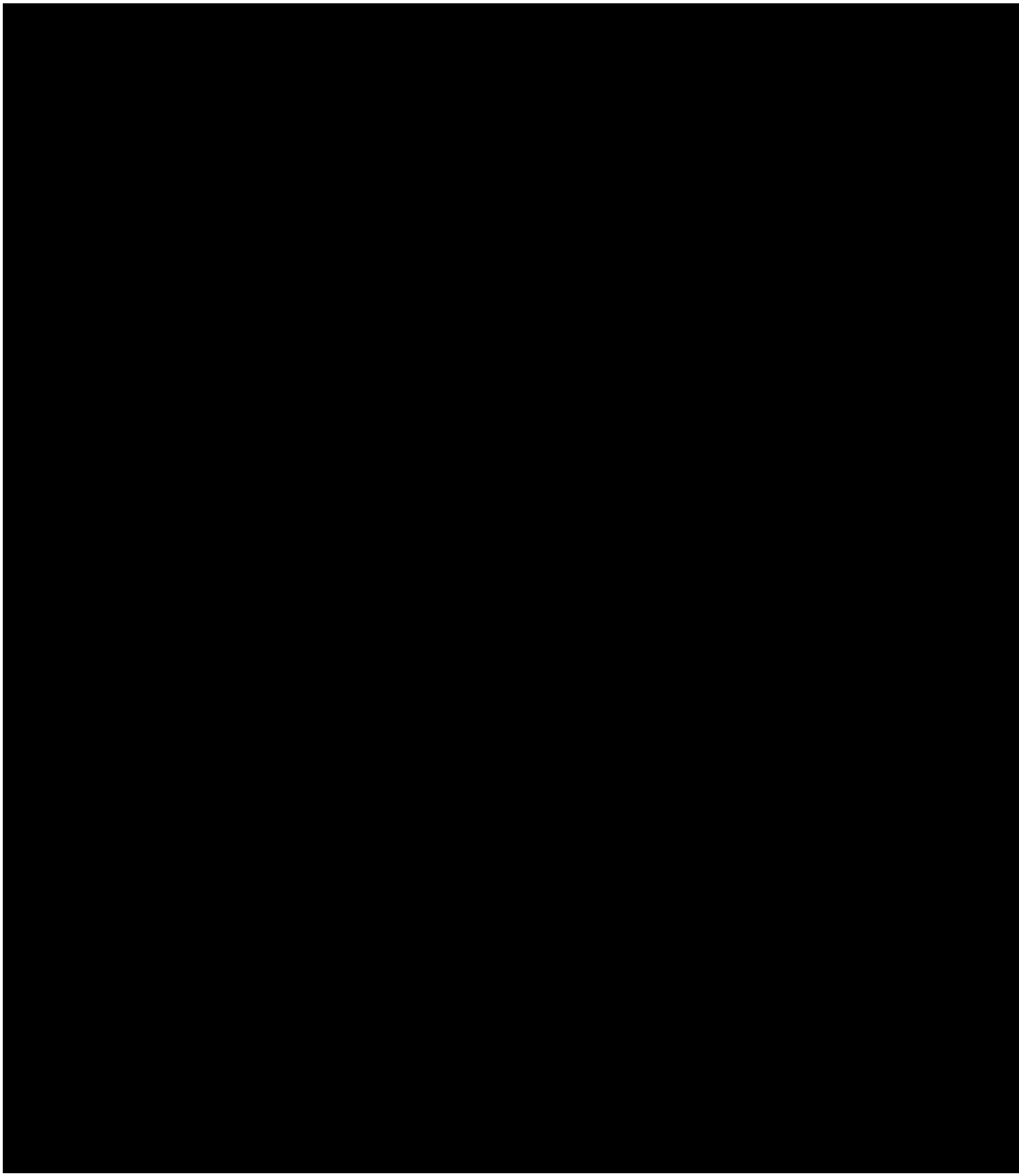
- Business & Management Consulting
- Case Management Solutions
- Curriculum Development
- Equity Solutions
- Policy Design & Implementation
- Project Management & Assurance
- Process Engineering & Design
- Regulatory Consulting
- Strategic Planning
- Student, Education & Special Education Services

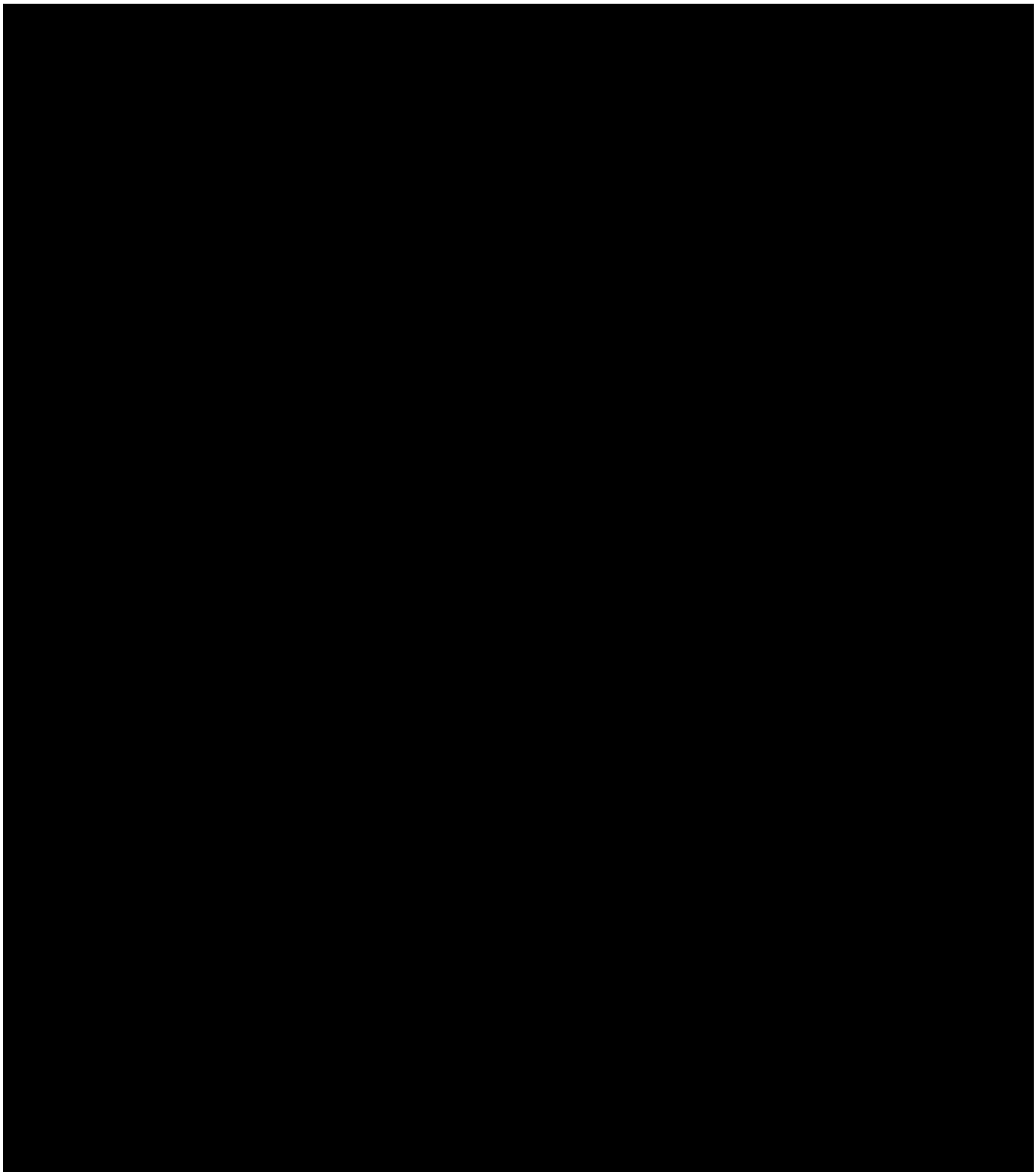
People, Processes & Management

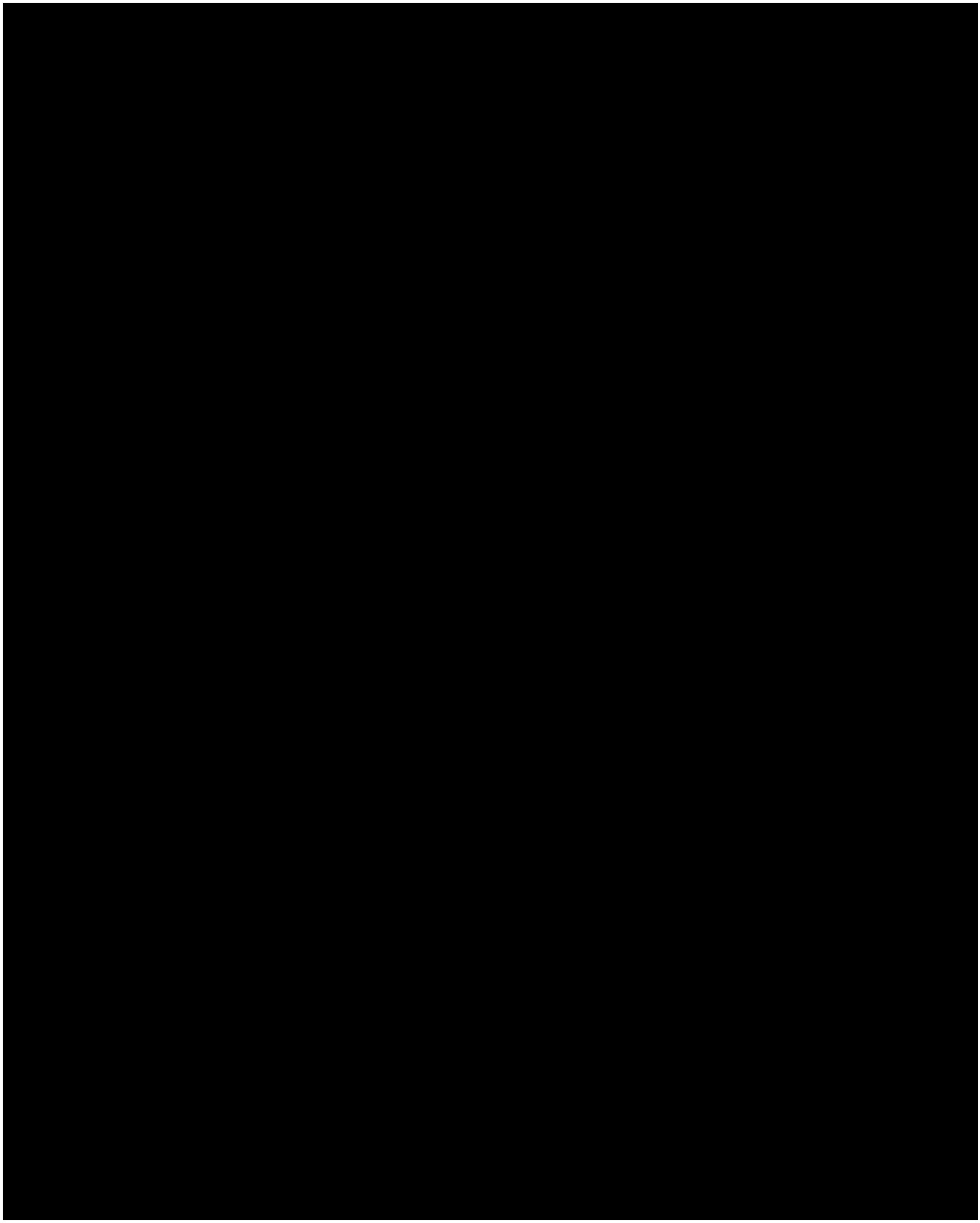
Our depth and experience bring solutions to life. We have the knowledge and context to work seamlessly alongside you from strategy to execution. We have extensive experience ranging from standing up emergency management operations in rapid form, to call center operations, special education service management, fiscal intermediary services, and other solutions.

- Behavioral Incident & Threat Assessment
- Call Center Operations
- Compliance & Monitoring
- Cost Allocation & Revenue Services
- Emergency Management
- Fiscal Intermediary Services
- GSA-Approved Federal Contractor
- Home, Human & Community-Based Services
- Medicaid & Medicare Management & Fiscal Services
- Staffing, Management & Operations

Figure 3.0: PCG excels in systems, data, technology, strategy, design, intelligence, people, processes, and management.







3.2 Relevant Qualifications and Experience

PCG has long, proven track record of successfully implementing hundreds of APIs and ETLs—including asset verification data sources on thirty different occasions—on behalf of dozens of HHS agencies over the last decade, as evidenced by the following successful PCG implementations:

- **Forty-one (41) APIs and ETL interfaces** connecting **Texas Health and Human Services Commission (HHSC)** to third-party verification data sources as part of our Data Broker Services and Predictive Analytics projects—including asset verification data.
- **Twenty-four (24) different APIs and ETL interfaces** connecting the **Alaska Department of Health and Social Services** to third-party verification data sources as part of our Enhanced Verification Services project—including asset verification data.
- **Fourteen (14) interfaces** were implemented and deployed on behalf of the **Ohio Department of Medicaid** as part of PCG's Eligibility Verification Services project—including asset verification data.
- **Thirteen (13) different APIs and ETL interfaces** connecting the **Nevada Division of Welfare and Supportive Services** to third-party verification data sources as part of our Income and Employment Verification and Data Analytics projects—including asset verification data.
- **Twelve (12) interfaces** are being implemented in support of the **Louisiana Department of Health** as part of our Data Broker Services project—to include asset verification data.
- **Nine (9) different interfaces** connecting the **Nebraska Department of Health and Human Services** agency to third-party verification data as part of our Unwinding Eligibility Verification Services project—including asset verification data.

- **Eight (8) different interfaces** connecting the **Virginia Department of Medical Assistance Services** to third-party verification data as part of our Eligibility Verification Services project.
- **Three (3) different interfaces** connecting **Connecticut, Maine, Maryland, and South Dakota HHS agencies** to third party verification data as part of Asset Verification System implementations.
- At least **two (2) interfaces** connecting state HHS agencies to third-party eligibility verification data sources as part of Asset Verification System implementations in **Delaware, Illinois, New Hampshire, New York, New York City, Oregon, and Wisconsin**.
- At **least one (1) interface** connecting HHS agencies to third-party verification data sources as part of Asset Verification System implementations in **Arizona, Colorado, District of Columbia, Hawaii, Massachusetts, Minnesota, Montana, Nebraska, New Jersey, North Carolina, Oklahoma, Rhode Island, Tennessee, Utah, Vermont, and Washington**.

PCG is by far the most experienced, most trusted asset and eligibility verification vendor in North America. For more than a decade, PCG has successfully integrated and operated state public assistance eligibility data interfaces and asset and eligibility verification solutions on behalf of more states than all of our competitors combined, as detailed in the following map.

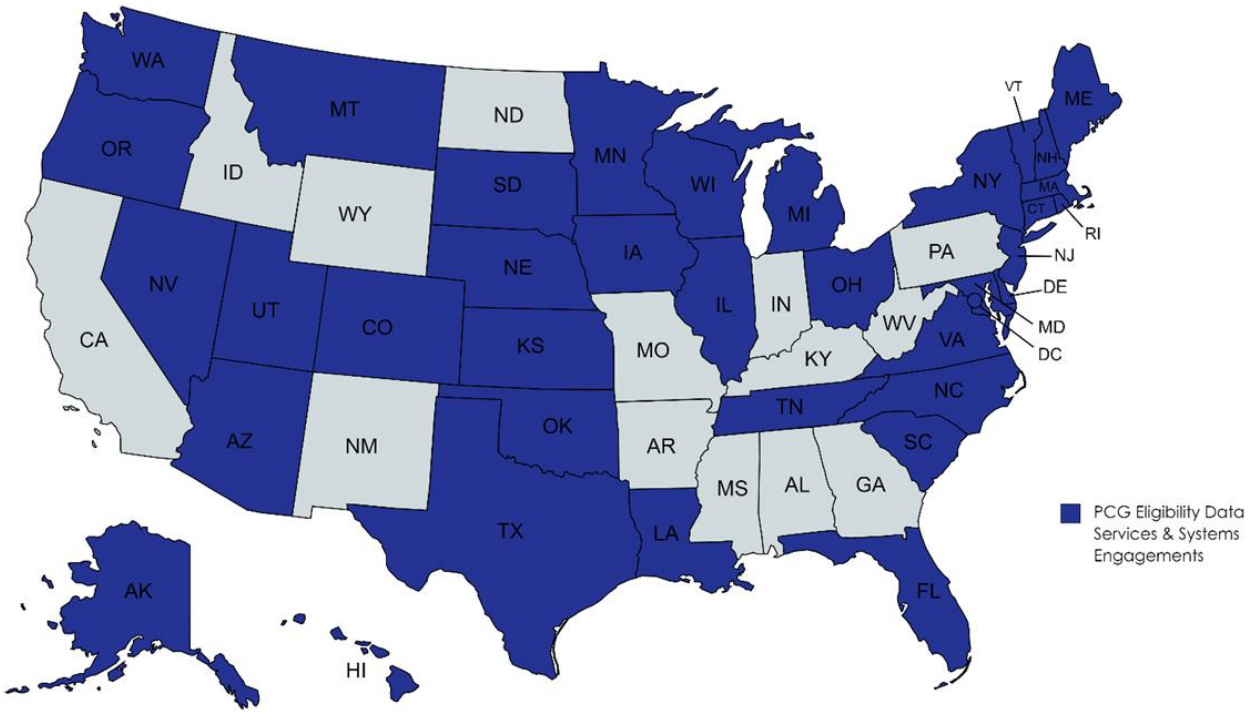


Figure 6.0: PCG is the country's premier HHS eligibility data partner. 36 state HHS agencies (and counting) have engaged PCG to provide public assistance eligibility data services and systems.

PCG has worked with Texas' Health and Human Services Commission (HHSC) as its "Data Broker Services" vendor since 2016. In this capacity, PCG manages the State's interfaces with third-party data used to verify public assistance eligibility, including their asset and property data. PCG successfully integrated and operates 41 different APIs and ETLs connecting the agency with dozens of Federal, state, and commercial data sources used to verify eligibility across Medicaid, SNAP, TANF, and a dozen other public assistance programs through a single primary interface with PCG. As the state's "data broker," PCG leverages our PCGOne platform to connect HHSC to multiple Federal data sources, including the Federal Data Services Hub, Department of Homeland Security Systematic Alien Verification for Entitlement (SAVE), Food and Nutrition Services Electronic Disqualified Recipient System (eDRS), Office of Child Support Enforcement National Director of New Hires (NDNH), and more—as well as dozens of state and commercial interfaces, including the Texas Workforce Commission, Texas Electronic Benefits Transfer (EBT), Texas Department of Criminal

Justice, Texas Department of Public Safety, Texas Department of Motor Vehicles, Texas Department of State Health Services, Texas Office of Attorney General, LexisNexis, TransUnion, Experian, First American, Accuity, J.D. Power & Associates, and more. PCG processes more than 500,000 daily transactions in an average of less than one second each.

PCG processes more than 180 million annual transactions accessing different combinations of commercial, state and federal data sources through PCGOne, each of which results in the near-instantaneous creation of a single on-screen HTML report featuring consolidated, organized results from all verification sources within the agency's integrated eligibility system. PCG also uses our data platform to automate, operate, and enhance the State's Medicaid Renewal/ex parte processes each month.

Subsequently, PCG developed a "Predictive Analytics" system for the State of Texas that automates the process of instantly evaluating all of this raw verification data against client-specific eligibility policy and known fraud profiles to identify fraud, predict eligibility, flag ineligibility and quantify the level of fraud and ineligibility risk associated with each area of the application.

PCG also supplemented our eligibility data services with the development of a stand-alone case and workflow management system to support certain user groups on an ad hoc basis, including allowing users to manually generate predictive analytics reports, query user-selected combinations of data sources, generate either pre-built or ad hoc reports, manage users, initiate communications, run ad hoc asset verification (AVS) and alien (SAVE) checks, and perform searches on people, vehicles, income, marriage and divorce, SNAP disqualifications, out-of-state shopping, and criminal histories.

The State of Alaska Department of Health and Social Services (DHSS) hired PCG in 2020 to design and develop their "Enhanced Verification System." In this capacity, PCG leveraged our experience developing Texas' Predictive Analytics System to design and deploy our fully configurable, SaaS-based

"Instant Eligibility Verification System & API Gateway" (IEVS), which uses 24 different state, federal, and commercial third-party data sources, combined with eligibility policy-based and fraud detection analytics, to instantly predict eligibility for 28 different public assistance programs.

DHSS uses PCG's IEVS to instantly verify whether clients meet the eligibility criteria for any one of 28 Alaska public assistance programs at the same time and to identify and flag any potential ineligibility and/or fraud. Because this solution is fully configurable to reflect state and member-specific eligibility policy while providing all of the verification data needed to support automated renewals through a single PCG interface, the State of Alaska also uses this system to facilitate and execute its ex parte renewal processes each month.

Alaska configured their service leveraging PCGOne to connect to federal sources like the Federal Data Services Hub, DHS SAVE, OCSE NDNH, FNS eDRS, and PARIS, state sources like the state's Housing, Quarterly Wages, Vital Statistics, Permanent Fund, and DMV data sources, and commercial sources including Appriss Incarceration, TransUnion Household Composition, TransUnion Person Search, TransUnion Premium Employment, LexisNexis Identity Verification, Accuity Asset Verification, and more.

Nevada's Division of Welfare and Supportive Services (DWSS) awarded PCG a large member eligibility data services scope of work which includes our IEVS, and combines it with dozens of data sources, to verify the eligibility of public assistance applicants and recipients. In our role as the State's (1) Income and Employment Verification vendor, (2) Incarceration Verification vendor, (3) Asset Verification Services vendor, (4) Data Analytics vendor, and (5) Identity Authentication vendor, PCG established and/or is in the process of establishing interfaces between the state and dozens of state, Federal, and commercial third-party data sources, either directly or via pass-through APIs, including: the Federal Data Services Hub, TransUnion Household Composition, TransUnion Premium Employment, TransUnion Property, TransUnion Income and Employment, Experian Income Insight, Experian Fraud Shield,

Appriss Incarceration Monitoring, Accuity AVS, J.D. Power & Associates, U.S. Office of Child Support Enforcement, U.S. Administration for Children and Families, U.S. Food and Nutrition Services, U.S. Citizenship and Immigration Services, Nevada's Division of Public and Behavioral Health, Nevada's Department of Employment, Training and Rehabilitation, Nevada's Employment Security Division, Nevada's Department of Motor Vehicles, and more.

PCGOne uses this data predict eligibility based on state and client-specific eligibility policy, flag ineligibility, identify fraud, and quantify the level of risk associated with each area of each application for Medicaid, SNAP, TANF, and other public assistance program applicants.

Ohio's Department of Medicaid (ODM) also hired PCG to use PCGOne to help the State "unwind" following the Public Health Emergency (PHE). In this capacity, PCG provides a "come behind" ex parte renewal process which uses more current and comprehensive data and analytics to automatically recheck the eligibility of any members flagged during the state's traditional ex parte process. As a result of adopting this unique secondary ex parte process, ODM has been able to auto-renew more than 600,000 redeterminations out of more than one million flagged as potentially ineligible via their traditional ex parte process during the first six months of the unwinding period, saving the time it would have taken more than 600 FTEs to process the manual renewal packets which would have otherwise been required.

ODM eligibility technicians also leverage PCGOne to perform more accurate eligibility redeterminations, informed by more current and comprehensive data from more sources, resulting in dramatic improvements in "one touch" redeterminations, ineligibility detection, and potential fraud.

Florida's Department of Children and Families (DCF) hired PCG to reconfigure our proprietary investigative case and workflow management system—InvestigatorCWMS—to manage fraud investigation cases and

nearly two dozen workflows designed to facilitate, automate, and track fraud cases from referral through prosecution, including all of the required steps in between.

In New York, PCG successfully leveraged PCGOne to connect the agency to the financial asset and real and personal property data used to support the resource-based eligibility determinations of Medicaid Long-Term Care (LTC) applicants and clients on behalf of the Department of Health. PCG designed and deployed a customized user interface, case management, and eligibility rules engine to identify resources exceeding program limits, flag potentially disqualifying asset transfers, and alert workers to suspicious or actionable “case clues” potentially affecting resource-based eligibility. PCG worked with both Upstate and New York City to implement our solution within our stand-alone interface, and later directly integrated our service into their current and legacy eligibility systems, while training thousands of eligibility workers across the State.

In Virginia, the Department of Medical Assistance Services (DMAS) engaged PCG to leverage PCGOne to automate the process of evaluating the eligibility of their entire Medicaid population in the weeks leading up to the unwinding period. PCG configured our rules engine to reflect the eligibility policy associated with each program code and household size variation to allow the agency to determine not only whether each member was eligible for the program they were currently enrolled in, but to also identify any other Medicaid programs each member might be eligible for.

PCG assisted the Nebraska Department of Health and Human Services in rapidly responding to CMS’s August 30th guidance regarding renewal packets being sent to eligible members in households in which additional documentation was required to verify eligibility for other household members and the subsequent procedural disenrollment of those otherwise eligible members who failed to return these packets.

In less than 30 days, PCG leveraged our PCGOne rules engine to reevaluate the eligibility of each of these effected members for every Nebraska Medicaid program type at the same time based on state and member-specific eligibility policy.

In addition to the asset and eligibility verification data services qualifications identified above, PCG is also connecting dozens of additional HHS agencies with third-party data and automated eligibility verification analytics—including as the prime contractor on 27 comparable asset verification engagements—as evidenced by the following, related qualifications:

Project	Agency	Scope
Enhanced Verification System / Asset Verification System	Alaska Department of Health and Social Services (2020 – Present)	PCG successfully leveraged our IEVS and HHS Eligibility Data Hub to implement a subscription service, supplemented with regularly scheduled bulk data matches, to verify applicants and recipients of assistance meet the eligibility criteria for Alaska public assistance programs quickly and accurately. This scope of work includes integrating multiple data sources into PCG's automated eligibility verification workflow to allow for the instant verification of income, employment, assets and more.
Asset Verification Services	Arizona Health Care Cost Containment System (2018 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect State-specific policy and to flag potentially disqualifying applicant criteria.

Project	Agency	Scope
		PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.
Asset Verification Services	Colorado Department of Health Care Policy & Financing (2017 – Present)	PCG integrated our asset verification data source into the State's eligibility system in concert with State and Deloitte technical team members.
Asset and Property Verification Services	Connecticut Department of Social Services (2019 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files. PCG is also currently working with the agency to integrate our AVS directly into their Deloitte-operated integrated eligibility system.
Asset and Property Verification Services	Delaware Division of Medicaid and Medical Assistance (2017 – Present)	PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients.
Asset Verification Services	District of Columbia DHS (2016 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients.

Project	Agency	Scope
Asset Verification Services	Hawaii Department of Human Services (2020 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG subsequently worked with the agency to integrate our AVS directly into their integrated eligibility system.
Asset and Property Verification Services	Illinois Department of Healthcare and Family Services (2018 – Present)	PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients.
Asset Verification Services	Iowa Department of Social Services (2018 – Present, as a subcontractor to Accuity)	PCG served as a consulting subject matter expert supporting the State's implementation of their AVS.
QA and MEQC Tool Development	Kansas Department of Health and Environment (2021 – Present)	PCG developed and deployed an "Eligibility Auditor & System Accuracy Assurance Engine" on the State's behalf. This automated quality assurance and auditing tool will allow the agency to verify the accuracy of the State's prior public assistance eligibility decisions by validating: (1) the caseworker's application of eligibility policy; (2) use of electronic data sources; (3) application processing procedures; and (4) system inputs and calculations.

Project	Agency	Scope
Data Broker Services	Louisiana Department of Health (2023 – Present)	PCG is integrating dozens of data sources from competing commercial vendors via a single interface connecting PCG's data hub to the agency's integrated eligibility system. The agency will leverage PCG's configurable multiplexer service to access agency-directed combinations of third-party data in support of more accurate and efficient public assistance eligibility decisions.
Asset and Property Verification Services	Maine Department of HHS (2017 – Present)	PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients.
Asset and Property Verification Services	Maryland DHS (2017 – Present)	PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. Subsequently, PCG later integrated both of these data sources directly into the State's eligibility system. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.
Asset Verification Services	Massachusetts Executive Office of HHS (2016 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients.

Project	Agency	Scope
		PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.
LTC Eligibility Project	Massachusetts Executive Office of HHS (2017)	PCG used third-party data to perform a one-time eligibility redetermination of more than 60,000 Medicaid LTC clients.
Medicaid Eligibility Quality Control Review Services	Michigan Department of HHS (2019 – 2021)	PCG was hired as the country's first CMS-approved Medicaid Eligibility Quality Control (MEQC) Pilot vendor. In this capacity, PCG defined and deployed a MEQC pilot review tool to verify the accuracy of the State's prior public assistance eligibility decisions by validating: (1) the caseworker's application of eligibility policy; (2) use of electronic data sources; (3) application processing procedures; and (4) system inputs and calculations.
Asset Verification Services	Minnesota DHS (2018 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect state-specific policy and to flag potentially disqualifying applicant criteria. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.
Asset Verification Services	Montana Department of	PCG integrated our asset verification data source into the State's eligibility system in

Project	Agency	Scope
	Public HHS (2019 – Present)	concert with State and Deloitte technical team members.
Asset Verification Services	Nebraska Department of HHS (2018 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect state-specific policy and to flag potentially disqualifying applicant criteria. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.
Unwinding Eligibility Verification Services	Nebraska Department of HHS (2023)	PCG assisted the Nebraska Department of Health and Human Services in rapidly responding to CMS's August 30th guidance regarding renewal packets being sent to eligible members in households in which additional documentation was required to verify eligibility for other household members and the subsequent procedural disenrollment of those otherwise eligible members who failed to return these packets. In less than 30 days, PCG leveraged our HHS Eligibility Data Hub and IEVS to reevaluate the eligibility of each of these effected members for every Nebraska Medicaid program type at the same time based on state and member-specific eligibility policy.

Project	Agency	Scope
Employment and Income Verification, Data Analytics	Nevada Department of HHS (2020 – Present)	The State recently awarded PCG a large scope of work which includes the eligibility verification service being proposed here. Under this contract, PCG will configure and deploy our IEVS to improve the accuracy and efficiency of eligibility decisions. PCG's solution includes dozens of APIs with third-party data sources combined with State policy-specific data matches.
Asset Verification Services	New Hampshire Department of HHS (2017 – Present)	PCG served as a consulting subject matter expert supporting the State's implementation of their AVS.
Asset Verification Services	New Jersey DHS (2016 – 2022)	PCG integrated our asset verification data source into the State's eligibility system in concert with State technical team members and Accuity.
Asset Verification and Real Property Resource Verification System	New York City Human Resources Administration (2014 – Present)	PCG successfully integrated financial asset and property data used to support the resource-based eligibility determinations of Medicaid LTC applicants and clients. PCG designed and deployed a customized user interface and eligibility rules engine to identify resources exceeding program limits, flag potentially disqualifying asset transfers, and alert workers to suspicious or actionable "case clues" potentially affecting resource-based eligibility.

Project	Agency	Scope
		PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files. PCG is also currently working with HRA to integrate our AVS directly into your Eligibility Data Image and Transfer System (EDITS) eligibility system.
Asset Verification and Real Property Resource Verification System	New York State Department of Health (2014 – Present)	PCG successfully integrated financial asset and property data used to support the resource-based eligibility determinations of Medicaid Long-Term Care (LTC) applicants and clients. PCG designed and deployed a customized user interface and eligibility rules engine to identify resources exceeding program limits, flag potentially disqualifying asset transfers, and alert workers to suspicious or actionable “case clues” potentially affecting resource-based eligibility. PCG worked with both Upstate and New York City to implement our solution and train thousands of eligibility workers across the State. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.
Asset Verification Services	North Carolina Division of Medical Assistance (2013 –	PCG served as a consulting subject matter expert and Project Manager supporting the State’s implementation and operation of their AVS.

Project	Agency	Scope
	Present, as a subcontractor)	
Eligibility Verification Services	Ohio Department of Medicaid (2021 – Present)	PCG is connecting the agency to dozens of third-party data sources which we are using to verify the eligibility of their Medicaid members who "fell out" of their traditional ex parte renewal process, allowing the agency to automate the renewals of hundreds of thousands of members who would've otherwise received a renewal packet.
Asset Verification System	Oklahoma Health Care Authority (2014 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect state-specific policy and to flag potentially disqualifying applicant criteria. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.
Asset and Property Verification Services	Oregon DHS (2018 – Present)	PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.

Project	Agency	Scope
Asset Verification Services	Rhode Island Executive Office of HHS (2018 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect state-specific policy and to flag potentially disqualifying applicant criteria. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.
Data Broker Services	South Carolina Department of Health and Human Services (2023)	PCG was selected to implement dozens of data sources from competing commercial vendors via a single interface connecting PCG's HHS Eligibility Data Hub to the agency's eligibility system.
Asset and Property Verification Services	South Dakota Department of Social Services (2016 – Present)	PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.
Asset Verification Services	Tennessee Division of TennCare (2018 – Present)	PCG integrated our asset verification data source into the State's eligibility system via API in concert with State and Deloitte technical team members.
Data Broker Services	Texas HHSC (2016 – Present)	PCG established and operates interfaces connecting the State's eligibility workers with

Project	Agency	Scope
		dozens of third-party data sources used to verify eligibility for public assistance through a single PCG interface. PCG also developed and implemented a predictive analytics solution which used third-party data, program eligibility policy and client attestations to predict eligibility, flag fraud, and quantify the risk of ineligibility. Finally, PCG supplemented our eligibility verification data services with the development of a stand-alone case and workflow management system to support certain user groups on an ad hoc basis, including allowing users to manually generate predictive analytics reports, query user-selected combinations of data sources, generate either pre-built or ad hoc reports, manage users, initiate communications, run ad hoc asset verification (AVS) and alien (SAVE) checks, and perform searches on people, vehicles, income, marriage and divorce, SNAP disqualifications, out-of-state shopping, and criminal histories.
Asset Verification Services	Utah Department of Workforce Services (2017 – Present)	PCG integrated our asset verification data source into the State's eligibility system in concert with State and Deloitte technical team members.

Project	Agency	Scope
Asset Verification Services	Vermont Department of Health Access (2017 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect state-specific policy and to flag potentially disqualifying applicant criteria.
Eligibility Verification Services	Virginia Department of Medical Assistance Services (2023)	The Department of Medical Assistance Services (DMAS) engaged PCG to leverage our HHS Eligibility Data Hub and IEVS to automate the process of evaluating the eligibility of their entire Medicaid population in the weeks leading up to the unwinding period. PCG configured our IEVS to reflect the eligibility policy associated with each program code and household size variation to allow the agency to determine not only whether each member was eligible for the program they were currently enrolled in, but to also identify any other Medicaid programs each member might be eligible for.
Asset Verification Services	Washington Health Care Authority (2017 – Present)	PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect state-specific policy and to flag potentially disqualifying applicant criteria.
Asset Verification Services	Wisconsin DHS (2018 – Present)	PCG integrated our asset verification data source into the State's eligibility system in concert with State and Deloitte technical team members.

Project	Agency	Scope
Automated Residency Verification System	Wisconsin Department of Health Services (2014 – Present)	PCG designed and developed a monthly post-enrollment batch file exchange allowing us to match public assistance client data to third-party data to identify clients not living inside of the State.

Figure 7.0: Our experience speaks for itself.

The proof is clear, and the evidence is simple: **PCG is the national leader in the provision of large-scale asset and eligibility verification data services and systems**. The projects highlighted above and in the previous section support PCG's qualifications to provide responsible, competent, and cutting-edge services on behalf of Puerto Rico's Department of Health.

3.3 Evidence of Organizational Capacity

It is important for Puerto Rico to understand that PCG features, by a wide margin, the most experienced asset verification project team in North America. PCG's proposed AVS project managers are by far the most experienced collection of asset and eligibility verification subject matter experts in the country, having spent the past 12 years deploying CMS-compliant asset and eligibility verification solutions on behalf of 36 state agencies. This means that we not only know asset verification, but we also know how to assist our clients in navigating issues and obstacles that are peripheral to asset verification implementations, including obtaining spouse or existing beneficiary authorizations, FCRA compliance, enhanced Federal funding, MITA certification, reasonable compatibility, ex parte renewal processing of Aged, Blind & Disabled (ABD) members, how to scale AVS to include additional data sources, and more.

PCG has maintained a cohesive AVS project team since 2016. Each key team member has supported dozens of high-profile HHS asset and eligibility verification engagements—working together—in the last decade, all of which are still active today.

As illustrated in the table below, PCG's AVS project personnel are the most experienced in the United States by a wide margin, while our competitor for this engagement has implemented AVS just three times.

	Thomas Aldridge, MHA, Executive Sponsor	Peter Cheesman, MBA, Account Owner	David Payne, PMP, PMO Director	Kalen Summers, MA, PMP, Project Manager	Marcus Asberg, MBA, PMP, Associate Project Manager	Jillian White, MS, Consultant	Naresh Kommineni, Technical Director	Adam Knowlton, Software Engineering Director	Vijay Shah, PMP, Software Engineering Manager	Deepti Johar, PMP, Delivery Manager	Joshna Bachuwar, Software Engineering Lead	Brenda Baldwin, MSA, Operations Manager
AK AVS	x	x	x	x	x	x	x	x	x			
AZ AVS	x	x		x		x		x		x	x	x
CO AVS	x	x		x	x	x	x	x	x	x	x	x
CT AVS	x	x		x		x		x		x	x	x
DE AVS	x	x		x			x	x	x	x	x	x
DC AVS	x	x		x			x	x	x	x	x	x
HI AVS	x	x		x		x	x	x		x	x	x
IL AVS	x	x		x	x	x	x	x	x	x	x	x
ME AVS	x	x		x	x	x	x	x	x	x	x	x
MD AVS	x	x		x	x	x	x	x	x	x	x	x

	Thomas Aldridge, MHA, Executive Sponsor	Peter Cheesman, MBA, Account Owner	David Payne, PMP, PMO Director	Kalen Summers, MA, PMP, Project Manager	Marcus Asberg, MBA, PMP, Associate Project Manager	Jillian White, MS, Consultant	Naresh Kommineni, Technical Director	Adam Knowlton, Software Engineering Director	Vijay Shah, PMP, Software Engineering Manager	Deepti Johar, PMP, Delivery Manager	Joshna Bachuwar, Software Engineering Lead	Brenda Baldwin, MSA, Operations Manager
MA AVS	x	x		x	x	x	x	x	x	x	x	x
MN AVS	x	x		x		x		x		x	x	x
MT AVS	x	x		x	x		x	x	x	x	x	x
NE AVS	x	x		x		x		x		x	x	x
NV AVS	x	x	x	x	x	x	x	x	x	x		
NJ AVS	x	x		x			x	x		x	x	x
NY AVS	x	x		x			x	x		x	x	x
NYC AVS	x	x		x			x	x		x	x	x
NC AVS	x	x		x	x	x		x		x	x	x
OK AVS	x	x		x		x	x	x	x	x	x	x

	Thomas Aldridge, MHA, Executive Sponsor	Peter Cheesman, MBA, Account Owner	David Payne, PMP, PMO Director	Kalen Summers, MA, PMP, Project Manager	Marcus Asberg, MBA, PMP, Associate Project Manager	Jillian White, MS, Consultant	Naresh Kommineni, Technical Director	Adam Knowlton, Software Engineering Director	Vijay Shah, PMP, Software Engineering Manager	Deepti Johar, PMP, Delivery Manager	Joshna Bachuwar, Software Engineering Lead	Brenda Baldwin, MSA, Operations Manager
OR AVS	x	x		x	x	x	x	x	x	x	x	x
RI AVS	x	x		x		x		x		x	x	x
SD AVS	x	x		x			x	x	x	x	x	x
TN AVS	x	x		x	x	x	x	x	x	x	x	x
TX AVS	x	x	x		x		x	x	x			
UT AVS	x	x		x	x	x	x	x	x	x	x	x
VT AVS	x	x		x		x		x		x	x	x
WA AVS	x	x		x		x	x	x	x	x	x	x
WI AVS	x	x		x		x	x	x	x	x	x	x

Figure 8.0: PCG's project team maintains more AVS experience than all PCG AVS competitors combined.

From Day One, PCG intends to deploy a fully prepared, deeply knowledgeable, and highly enthusiastic group of professionals who have a demonstrated track record of working well together in implementing and operating asset verification services and systems across the country. The staffing plan for this project is distinctive for the multiple and well-developed skill sets that can be applied to Puerto Rico's scope of work by members of the PCG Team. Given this group's combined experience providing comparable services in thirty-six states in the past decade, we are confident that PCG provides the most experienced and qualified asset verification data services project team in the United States (by a very wide margin).

One reason, among others, for PCG's strong track record with successful client engagements, performed in compliance with all contractual requirements, is our use of project management methodologies derived from industry best practices and the Project Management Institute's (PMI®) *Project Management Body of Knowledge® (PMBOK®)*. Led by PMO Director, David Payne, PMP, Project Manager, Kalen Summers, PMP, Associate Project Manager, Marcus Asberg, PMP, Delivery Manager, Deepti Johar, PMP, and Software Engineering Manager Vijay Shah, PMP, PCG will leverage standard project management best practices to ensure PRMP is expertly supported during all phases of this engagement, and in compliance with all contractual requirements. This will allow PCG to serve as a true partner to Puerto Rico and your stakeholder agencies for the duration of this engagement.

The table that follows describes key project team members' roles and responsibilities.

Resource Name	Project Role	Role Description and Experience
Project Leadership		

Resource Name	Project Role	Role Description and Experience
Thomas Aldridge, MHA	Executive Sponsor	Mr. Aldridge will serve as PCG's Executive Sponsor. Thomas has been with PCG for more than 25 years, is one of just 15 shareholders in the firm, and heads the Payer Services unit of PCG's Health Practice Area. In this capacity, he leads PCG's efforts to control costs for payers through the placement of tighter controls on member eligibility, provider oversight and monitoring, and consumer assistance initiatives. Thomas will be ultimately responsible for overall contract compliance on this engagement, working with the Account Director and Project Manager in risk identification, mitigation, and resolution activities. He will be heavily involved in the stakeholder management and project governance aspects of this engagement and will be the point of contact for any required escalation and crisis management activities during this engagement.
Peter Cheesman, MBA	Account Owner	Mr. Cheesman will serve as PCG's Account Director. Peter has been with PCG for more than 14 years and oversees PCG's System Integration Solutions Center of Excellence, maintaining overall responsibility for all PCG's eligibility verification HHS eligibility data projects, products, and services. Peter maintains more than 20 years of public sector consulting experience, including working on behalf of more than 50 public sector agencies to identify billions of dollars in cost avoidance opportunities. Peter assumed a similar project

Resource Name	Project Role	Role Description and Experience
		leadership role on dozens of key PCG asset and eligibility verification engagements. Peter will serve as Puerto Rico's escalation point for the duration of the project. Peter will ensure best practices and lessons learned are incorporated into all project activities while managing client satisfaction, contractual, and stakeholder engagement assurance activities throughout the project.
David Payne, PMP	PMO Director	David maintains 30 years of information technology experience, the majority of which has been spent working with state HHS agencies on system implementations and operations. David came to PCG in 2016 and oversaw PCG's flagship "Data Broker Services" implementation on Texas's behalf. Since then, David has successfully overseen large-scale eligibility data implementations in half a dozen other states, most recently in Florida. David will provide overall project direction and administration oversight in his role as PMO Director on this engagement. He will have the authority to represent PCG in all discussions regarding matters pertaining to this agreement and to make all decisions related to the services provided under this agreement.

Resource Name	Project Role	Role Description and Experience
Kalen Summers, MA, PMP	Project Manager	As the country's most experience asset verification project manager, Mr. Summers will serve as PCG's Project Manager. He is a certified Project Management Professional (PMP) and Lean Six Sigma Black Belt who has worked with PCG for nearly a decade, including overseeing critical asset verification system implementations and operations on behalf of the Maryland Department of Human Services, Delaware Division of Medicaid and Medical Assistance, South Dakota Department of Social Services, Oregon Department of Human Services, Wisconsin Department of Human Services, Arizona Health Care Cost Containment System, Colorado Department of Health Care Policy and Financing, District of Columbia Department of Human Services, Massachusetts Executive Office of Health and Human Services, Minnesota Department of Human Services, Nebraska Department of Health and Human Services, Rhode Island Executive Office of Health and Human Services, Tennessee Division of TennCare, Utah Department of Workforce Services, Vermont Department of Health Access, and Washington Health Care Authority. Kalen will provide development and operations oversight and direction to the project team during all phases of this engagement. He will have the authority to represent PCG in all discussions regarding matters pertaining to

Resource Name	Project Role	Role Description and Experience
		this agreement and to make day-to-day operational decisions related to the services provided under this agreement.
Marcus Asberg, MBA, PMP	Associate Project Manager	Mr. Asberg will serve as PCG's Associate Project Manager. Marcus has more than 20 years of experience focusing on state HHS member eligibility programs, systems, and operations. Marcus specializes in compliance, cost containment, and payment integrity services, which have resulted in hundreds of millions of dollars in HHS agency recoveries and cost savings. As a leading subject matter expert in the Medicaid payment integrity space, Marcus has assisted dozens of agencies streamlining operations ensuring that resources are used efficiently, thus maximizing the return on investment while also ensuring that programs are compliant with state and federal regulations. Marcus assumed a similar project leadership role on dozens of key PCG identity and eligibility verification/data analytics engagements. Marcus will serve as Kalen's "#2" in ensuring the expert management of this engagement in accordance with best practices, lessons learned, and Project Management Institute's (PMI®) Project Management Body of Knowledge® (PMBOK®) principles.
Consulting Leadership		

Resource Name	Project Role	Role Description and Experience
Rich Albertoni, MPA	Medicaid Eligibility Policy Manager	Mr. Albertoni will serve as PCG's Medicaid Eligibility Policy Manager. Rich is a seasoned veteran of Medicaid and state health care innovation. He maintained a long tenure with the Wisconsin Department of Health Services (1992-2000 and 2003-2011), including as the Director of Eligibility, Deputy Director of Fiscal Services, and Section Chief for the Hospital and Pharmacy benefits. Since joining PCG in 2011, Mr. Albertoni has been the firm's consulting lead on state healthcare transformations ranging from Health Insurance Marketplace implementation, Medicaid expansion, Managed Care Implementation, and Mental Health System Reform. He specializes in helping states find unique solutions to healthcare innovation that meet local needs. For example, he helped Arkansas and New Hampshire implement Medicaid Expansions that leveraged Marketplace Qualified Health Plans as the delivery system.
Paul Lefkowitz, MA	SNAP & TANF Eligibility Policy Lead	Mr. Lefkowitz will serve as PCG's SNAP & TANF Eligibility Policy Lead. Mr. Lefkowitz has spent 20+ years working with HHS agencies, with experience ranging from front-line eligibility determinations to program administration, to management consulting projects spanning a wide variety of social service and safety net programs. He has worked with states to align policy, eligibility determination, and verification processes across public assistance programs,

Resource Name	Project Role	Role Description and Experience
		streamline eligibility for childcare subsidy programs, identify and document TANF Maintenance of Effort (MOE) opportunities, and more. Prior to joining PCG in 2012, Paul served as Family Assistance Policy Director for the Tennessee Department of Human Services, where his responsibilities included oversight of TANF, SNAP, the Child Care Subsidy Program, and Medicaid eligibility determination. This role included ensuring the state complied with TANF requirements related to child support cooperation.
Operations Leadership		
Brenda Baldwin, MSA	Business Operations Lead	Ms. Baldwin will serve as PCG's Operations Lead. Brenda is a PCG Senior Advisor with more than a decade of experience in public sector welfare eligibility and system implementation. In her capacity with PCG, Ms. Baldwin has managed high profile eligibility verification implementations in New York State, New York City, Illinois, Oregon, Delaware, and Wisconsin. She has also spent the past five years supporting eligibility verification implementations in New Jersey, Alaska, Maryland, South Dakota, Tennessee, Vermont, Hawaii and Utah as a delivery manager and product owner. Prior to joining PCG, Brenda worked with Deloitte testing integrated eligibility systems in the states of New Mexico, Georgia and Michigan. Before that, Brenda worked for Michigan's Department of Health and

Resource Name	Project Role	Role Description and Experience
		Human Services overseeing welfare eligibility staff and operations for nearly a decade.
Jillian White, MS	Consultant	Ms. White will serve as “jack of all trades” consulting on this engagement. Jillian has spent the past three years supporting AVS engagements across the United States in this capacity and played a lead role in AVS implementations and operations in the states of Connecticut, Hawaii, Illinois, Massachusetts, Minnesota, Nebraska, Rhode Island, Tennessee, Utah, and Wisconsin.
Technical Leadership		
Naresh Kommineni	Technical Director	Mr. Kommineni will serve as PCG’s Technical Director. Naresh maintains more than 25 years of technical experience, including 13 years focused specifically on state HHS agency solutions. Naresh is a top-performing software development architect and engineer credited with combining IT delivery solutions, program and project management to deliver appropriately designed, streamlined and efficient systems in highly competitive HHS markets. Naresh managed PCG’s technical delivery and system performance activities on each of PCG’s key HHS identity, eligibility verification, and data analytics engagements since 2016.

Resource Name	Project Role	Role Description and Experience
Adam Knowlton	Software Engineering Director	Mr. Knowlton will serve as PCG's Software Engineering Director. Adam maintains more than 15 years of software engineering experience, including the last five years as PCG Health's Software Engineering Manager. Adam served in a similar capacity on more than 25 PCG asset and/or eligibility verification engagements since 2012 and was also responsible for the engineering of several other high profile PCG systems.
Vijay Shah, PMP	Software Engineering Manager	Mr. Shah will serve as PCG's Software Engineering Manager. Vijay comes with 17 years of professional software development experience and currently manages and leads development efforts at PCG's Health Software Division. He has actively participated in complete software development life cycle of web based and client-server applications in various Microsoft and Amazon's cloud technologies across multiple business areas like Eligibility verification, Enterprise Content Management, Healthcare, Insurance, Publishing, Communication, Compliance, Automation and Real Estate.
Joshna Bachuwar	Software Engineering Lead	Ms. Bachuwar will serve as PCG's Software Engineering Lead. Joshna has successfully supported more than two dozen AVS implementations across the country and maintains more than 15 years of software engineering experience. Joshna received a degree in electronics engineering from Shri Guru Gobind Singhji Institute of

Resource Name	Project Role	Role Description and Experience
		Technology in 2003. Joshna will dedicate as much time as needed to this engagement to ensure DHHS's satisfaction and to maintain the ongoing performance of PCG's AVS.
Deepti Johar, PMP	Delivery Manager	Ms. Johar will serve as PCG's Delivery Manager. Deepti has overseen the delivery of high-profile PCG systems since 2014, including PCG's Data Intermediary System (New Jersey Department of Health), Medicaid Cost Reporting System (Wisconsin Department of Human Services), and Asset Verification System (New York State Department of Health, Maryland Department of Human Services, Delaware Division of Medicaid and Medical Assistance, South Dakota Department of Social Services, Oregon Department of Human Services, Wisconsin Department of Human Services, New York City Human Resources Administration/Department of Social Services, Arizona Health Care Cost Containment System, Colorado Department of Health Care Policy and Financing, District of Columbia Department of Human Services, Massachusetts Executive Office of Health and Human Services, Minnesota Department of Human Services, Nebraska Department of Health and Human Services, Oklahoma Health Care Authority, Rhode Island Executive Office of Health and Human Services, Tennessee Division of TennCare, Utah Department of Workforce Services, Vermont Department of Health Access and Washington Health Care Authority).

Resource Name	Project Role	Role Description and Experience
Greg Tognetti, CAPM	Business Systems Analyst	Mr. Tognetti will serve as PCG's Business Systems Analyst. Greg is a PCG Business Systems Analyst who performs ongoing system and data analyses in support of each of PCG's high profile identity and/or eligibility verification/data analytics engagements. Prior to joining PCG, Greg spent nearly two decades providing system analysis and evaluation services in the financial services industry.
Independent Security & Compliance Oversight		
Michael Marotta, IPE	Compliance Manager	Mr. Marotta will serve as PCG's Compliance Manager. Michael is PCG's Governance, Risk and Compliance (GRC) Officer. He joined the firm in 2016 with extensive experience in risk management, corporate ethics and governance, regulatory compliance, internal audit, and strategic planning, both in the U.S. and abroad. Prior to joining PCG, Mr. Marotta was the Director of GRC at Crane Currency and had similar risk management and compliance positions at MassMutual Financial Group, Goldman Sachs and The Bank of New York. As the firm's GRC Officer, Mr. Marotta maintains ultimate responsibility for assuring PCG's employment and income verification service is compliant with State and federal requirements, including FCRA.

Resource Name	Project Role	Role Description and Experience
Michael Bedford	Information Security Director	Mr. Bedford will serve as PCG's Information Security Director. Michael has over 20 years of enterprise technology management and consulting experience. He is an expert in enterprise risk management, security policy development, risk assessment, security training, and regulatory guidance. Mr. Bedford has experience with compliance management and audit expertise with thorough knowledge of HIPAA, FISMA, SOX, GLB, PCI, IRS, FERPA, HITECH as well as business continuity, disaster recovery design, and deployment subject matter expert specializing in virtualization and cloud-based solutions. He is adept in modern control concepts including data confidentiality and protection, access control and authentication, network security design, incident response and forensic data analysis. Mr. Bedford is an expert in industry security frameworks including NIST 800 series, ISO 27000 series, COBiT, FIPS, and MITA. He is highly credentialed in CISSP, CIPM, GCSC, CISA, CISM, CBCP, MCSE, and ITIL certifications.

Figure 9.0: PCG maintains the country's most experienced asset and eligibility verification services team in North America—by a wide margin.

PCG's key project personnel have all worked closely together since 2016. As a result, the PCG Team has a clear understanding of Puerto Rico's goals and as it pertains to your asset verification system project.

PCG has provided our project organizational chart below:

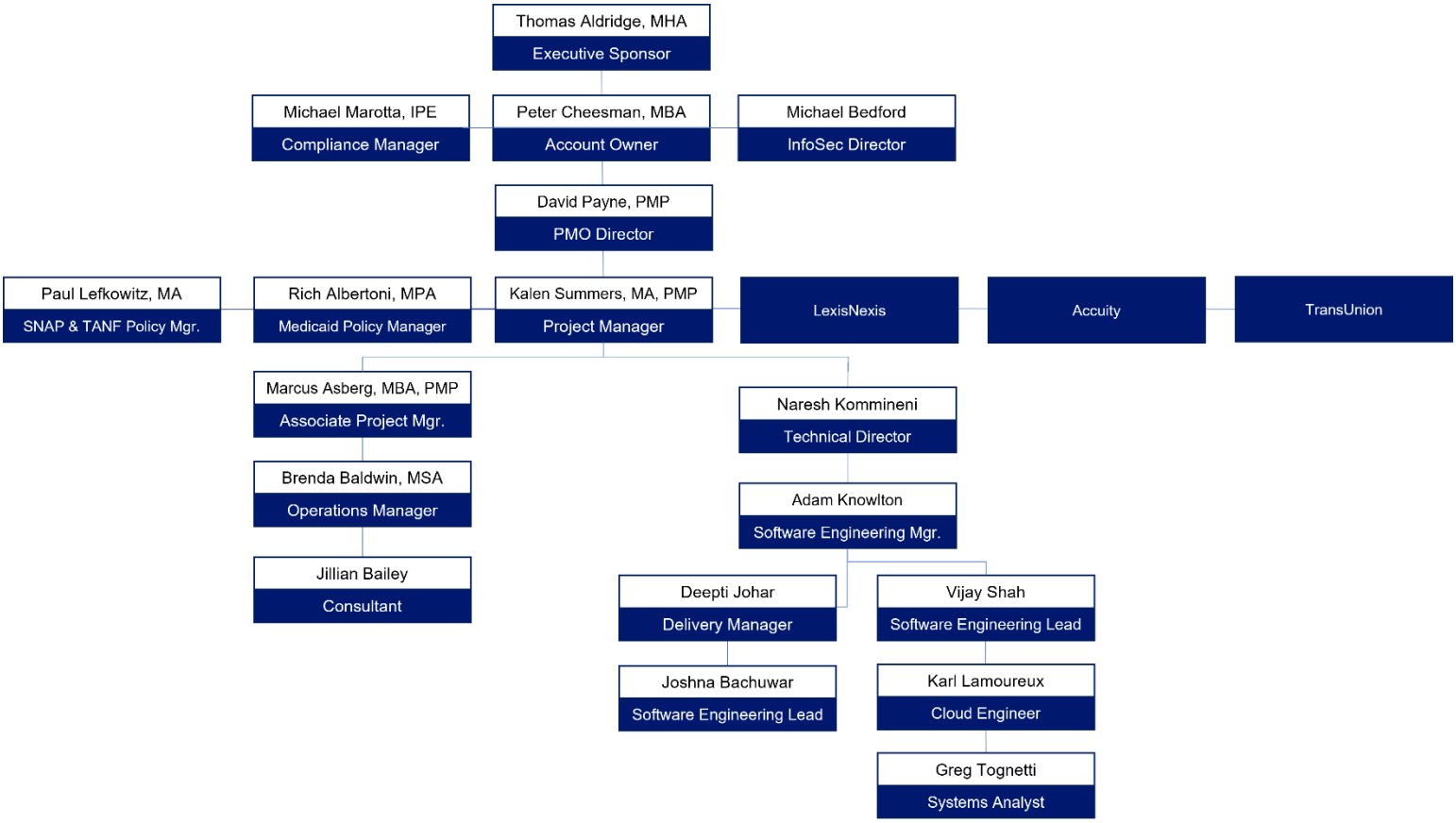


Figure 10.0: PCG's AVS Organizational Chart.

PCG has included the resumes of key project personnel as ***Appendix 1*** of this proposal.

3.4 Subcontractors

To ensure Puerto Rico has the most robust and effective asset verification service possible, PCG has once again partnered with the world's foremost information services organizations on this engagement, including Accuity, LexisNexis, and TransUnion. We have worked many times with this assembled group of competing commercial data providers. As a result, PCG has existing, operational application programming interfaces (APIs) with each of these vendors, as well as hundreds of other critical commercial, federal, and state data sources. In fact, PCG is currently providing public assistance asset and eligibility verification services which are informing more than 100,000 eligibility decisions **each and every day** on behalf of tens of thousands of eligibility technicians in thirty (30) states, most of which include at least one source of data from at least one of these vendors.

ACCUITY A key differentiator between PCG and any other vendor is our inclusion of Accuity financial asset data in our proposed solution. Because of this, **PCG can offer Puerto Rico access to more than 90 percent of the financial institutions in the United States and a growing network of financial institutions in Puerto Rico**. If a vendor isn't proposing to use Accuity's unique network of FIs, then they are only proposing to include less than one percent of the country's FIs in their AVS network. Without the remaining 90+ percent of FIs, Puerto Rico will never be able to automate Medicaid renewals and will incur millions of dollars in unnecessary program expenditures. Accuity is providing the same financial asset verification data on behalf of 48 states and the Social Security Administration.

PCG has worked with Accuity on 30 different occasions. As a result, we maintain an excellent working relationship that includes streamlined protocols for managing their performance. For example, PCG maintains a "Discrepancy Log" on behalf of each of our AVS clients. This log captures any discrepancies reported by agency workers related to Accuity's asset data and/or FI participation. PCG shares this log with both the agency and

Accuity and provides the agency with weekly status updates on any outstanding discrepancies. We will do the same on PRMP's behalf, as well.

Further, PCG runs monthly FI participation, response rate, and response time analyses to provide us with insight into the effectiveness of Accuity's management of our clients' FI network, which will be especially important in Puerto Rico as Accuity builds their network of participating FIs. **Accuity's network of Puerto Rico-based FIs currently includes 676 participating banks located in Puerto Rico, as well as thousands of additional banks located in the continental United States**.

In the event unresponsive or slow-responding FIs are identified, PCG works closely with Accuity to prompt the FI to action, including working with the FI to implement the use of a faster, more automated response method (e.g., via API or batch, rather than mail or fax).

Finally, these analyses will be shared with PRMP monthly, as well, ensuring you are aware of any of these same FI network issues should they occur. PCG has included Accuity's current regional network of participating financial institutions as ***Appendix 2*** of this proposal.

LexisNexis® PCG has also partnered with LexisNexis on this engagement to obtain access to the largest commercially available repository of property records in the world, drawing from more than 82 billion identity records and information on 10.6 billion unique name and address records drawn from more than 10,000 disparate data sources. LexisNexis is unique in that they maintain extensive data and records on "underbanked" populations. PCG has implemented LexisNexis data in 15 other states and feel they maintain the right property data for Puerto Rico, which is sourced from more than 98 percent of the mortgage, deed, and assessment records in the United States.

LexisNexis maintains records on over two million Puerto Rico citizens in their database that is updated routinely by thousands of data sources. Unlike their mainland-based

coverage which benefits from access to assessment and deed data from those states, in Puerto Rico LexisNexis and every other major data provider are reliant on non-property specific records, across several databases, that reference addresses in Puerto Rico. This allows for the potential identification of property associated with the client. As a result, property records can admittedly sometimes be dated. However, when combined with records PCG will obtain from Puerto Rico's Municipal Revenue Collection Center, PCG can obtain a comprehensive view of your clients' property ownership and sale history and ascertain its impact on potential Medicaid eligibility.

LexisNexis is providing similar data services across the United States and on PCG's behalf, including in the states of Alaska, Connecticut, Delaware, Illinois, Maine, Maryland, Nebraska, New York, Rhode Island, South Dakota, and Texas.

Finally, PCG has also partnered with TransUnion on this engagement because they not only maintain one of the largest databases of consumer information in the world, but because they have also pioneered unique applications of their data and continue to develop new capabilities each year. One such example is TransUnion's unique ability to identify all adults—not just those adults acknowledged by an applicant—living in a household with nothing more than an input address. Another example is TransUnion's use of alternative data solutions to identify and flag new employment. PCG currently uses TransUnion data in five (5) states and is proposing to leverage their access to more than 90 percent of the motor vehicle registrations in the United States to identify any currently or previously owned motor

[redacted]

The facts are indisputable and critical when considering your asset verification system vendor. No other vendor maintains a more experienced AVS project team nor better, more actionable asset verification data.

3.5 References

On the following pages, PCG has first provided our references, and we have then provided references for each of our subcontractors.

Attachment B
2024-PRMP-MES-AVS-005

The vendor is NOT to change any of the pre-filled cells in the following tables.
The vendor may add additional reference tables as necessary.

Vendor Reference Form

Vendor Information		
Vendor Name: Public Consulting Group LLC	Contact Name:	**Peter Cheesman**
	Contact Phone:	**207-861-1950**
Customer Information		
Customer Organization: South Dakota Department of Social Services	Contact Name:	Samuel Masten
	Contact Title:	Application/Business Project Manager
Customer Address: 811 E. 10th St., Sioux Falls, SD 57103	Contact Phone:	605-295-3427
	Contact Email:	Samuel.Masten@state.sd.us

Project Information	
Total Vendor Staff:	**10**
Project Objectives: Implementation of electronic asset verification solution involving financial, real property and motor vehicle data into existing state eligibility system to be used to verify the resources of ABD applicants and beneficiaries.	
Project Description: Asset Verification Services (AVS)	
Vendor's Involvement: PCG assisted the State in designing and implementing an electronic AVS in which the State could integrate AVS results into its eligibility system.	
Project Benefits: Timely, streamlined, electronic bank responses, ability to discover undisclosed bank accounts, real property and motor vehicles	

Key Personnel	
Name: Kalen Summers	Role: Project Manager
Name: Dave Bogan	Role: Operations Manager
Name: Joshna Bachuwar	Role: Head Developer

Project Measurements:	
Estimated one-time costs: $125,000	Actual one-time costs: $125,000
Reason(s) for change in one-time cost: n/a	

Attachment B
2024-PRMP-MES-AVS-005

Original Value of Vendor's Contract: $388,000		Actual Total Contract Value: $338,000		
Reason(s) for change in value: n/a				
Estimated Start & Completion Dates:	From:	08/2016	To:	11/2016
Actual Start & Completion Dates:	From:	08/2016	To:	11/2016
Reason(s) for difference between Estimated and Actual dates: n/a				
If the vendor performed the work as a Subcontractor, the vendor should describe the scope of subcontracted activities:				

Attachment B
2024-PRMP-MES-AVS-005

The vendor is NOT to change any of the pre-filled cells in the following tables.
The vendor may add additional reference tables as necessary.

Vendor Reference Form

Vendor Information		
Vendor Name: Public Consulting Group LLC	Contact Name:	**Peter Cheesman**
	Contact Phone:	**207-861-1950**
Customer Information		
Customer Organization: Utah Department of Workforce Services	Contact Name:	Jake Parlett
	Contact Title:	Systems Manager
Customer Address: 140 E Broadway, Salt Lake City, UT 84111	Contact Phone:	801-643-0561
	Contact Email:	jparlett@utah.gov

Project Information	
Total Vendor Staff:	**10**
Project Objectives: Implementation of electronic asset verification solution into existing state eligibility system to be used to verify the resources of ABD applicants and beneficiaries.	
Project Description: Asset Verification Services (AVS)	
Vendor's Involvement: PCG assisted the State in designing and implementing an electronic AVS in which the State could integrate AVS results into its eligibility system.	
Project Benefits: Timely, streamlined, electronic bank responses, ability to discover undisclosed bank accounts	

Key Personnel	
Name: Kalen Summers	Role: Project Manager
Name: Dave Bogan	Role: Operations Manager
Name: Joshna Bachuwar	Role: Head Developer
Project Measurements:	
Estimated one-time costs: $344,266	Actual one-time costs: $344,266
Reason(s) for change in one-time cost: n/a	

Attachment B
2024-PRMP-MES-AVS-005

Original Value of Vendor's Contract: $4,250,000		Actual Total Contract Value: $4,250,000		
Reason(s) for change in value: n/a				
Estimated Start & Completion Dates:	From:	11/2017	To:	04/2018
Actual Start & Completion Dates:	From:	11/2017	To:	04/2018
Reason(s) for difference between Estimated and Actual dates: n/a				
If the vendor performed the work as a Subcontractor, the vendor should describe the scope of subcontracted activities:				

Attachment B
2024-PRMP-MES-AVS-005

The vendor is NOT to change any of the pre-filled cells in the following tables.
The vendor may add additional reference tables as necessary.

Vendor Reference Form

Vendor Information		
Vendor Name: Public Consulting Group LLC	Contact Name:	**Peter Cheesman**
	Contact Phone:	**207-861-1950**
Customer Information		
Customer Organization: Arizona Health Care Cost Containment System	Contact Name:	Marshall Wilmot
	Contact Title:	Deputy Assistant Director, Systems Support
Customer Address: 801 E Jefferson, Phoenix, AZ 85034	Contact Phone:	480-438-5394
	Contact Email:	Marshall.wilmot@azahcccs.gov

Project Information	
Total Vendor Staff:	**10**
Project Objectives: Implementation of electronic asset verification solution into existing state eligibility system to be used to verify the resources of ABD applicants and beneficiaries.	
Project Description: Asset Verification Services (AVS)	
Vendor's Involvement: PCG assisted the State in designing and implementing an electronic AVS in which the State could integrate AVS results into its eligibility system.	
Project Benefits: Timely, streamlined, electronic bank responses, ability to discover undisclosed bank accounts	

Key Personnel	
Name: Kalen Summers	Role: Project Manager
Name: Jillian White	Role: Consultant
Name: Joshna Bachuwar	Role: Head Developer
Project Measurements:	
Estimated one-time costs: $350,000	Actual one-time costs: $350,000
Reason(s) for change in one-time cost: n/a	
Original Value of Vendor's Contract: $2,650,000	Actual Total Contract Value: $2,650,000

Attachment B
2024-PRMP-MES-AVS-005

Reason(s) for change in value: n/a				
Estimated Start & Completion Dates:	From:	09/2018	To:	01/2019
Actual Start & Completion Dates:	From:	09/2018	To:	01/2019
Reason(s) for difference between Estimated and Actual dates: n/a				
If the vendor performed the work as a Subcontractor, the vendor should describe the scope of subcontracted activities:				

Attachment B
2024-PRMP-MES-AVS-005

The vendor is NOT to change any of the pre-filled cells in the following tables.
The vendor may add additional reference tables as necessary.

Vendor Reference Form

Vendor Information		
Vendor Name: Public Consulting Group LLC	Contact Name:	**Peter Cheesman**
	Contact Phone:	**207-861-1950**
Customer Information		
Customer Organization: Connecticut Department of Social Services	Contact Name:	Frank Hoefling
	Contact Title:	IT Project Manager
Customer Address: 55 Farmington Ave, Hartford, CT 06105-3724	Contact Phone:	860-424-5797
	Contact Email:	Frank.hoefling@ct.gov

Project Information	
Total Vendor Staff:	**10**
Project Objectives: Implementation of electronic asset verification solution into existing state eligibility system to be used to verify the resources of ABD applicants and beneficiaries.	
Project Description: Asset Verification Services (AVS)	
Vendor's Involvement: PCG assisted the State in designing and implementing an electronic AVS in which the State could integrate AVS results into its eligibility system.	
Project Benefits: Timely, streamlined, electronic bank responses, ability to discover undisclosed bank accounts	

Key Personnel	
Name: Kalen Summers	Role: Project Manager
Name: Jillian White	Role: Consultant
Name: Joshna Bachuwar	Role: Head Developer
Project Measurements:	
Estimated one-time costs: $350,000	Actual one-time costs: $350,000
Reason(s) for change in one-time cost: n/a	
Original Value of Vendor's Contract: $600,000	Actual Total Contract Value: $600,000

Attachment B
2024-PRMP-MES-AVS-005

Reason(s) for change in value: n/a				
Estimated Start & Completion Dates:	From:	09/2019	To:	02/2020
Actual Start & Completion Dates:	From:	09/2019	To:	02/2020
Reason(s) for difference between Estimated and Actual dates: n/a				
If the vendor performed the work as a Subcontractor, the vendor should describe the scope of subcontracted activities:				

Attachment C
2024-PRMP-MES-AVS-005

Subcontractor Reference Form

Subcontractor Information		
Vendor Name: LexisNexis	Contact Name:	**Doug Tomlin**
	Contact Phone:	**804-349-8697**
Customer Information		
Customer Organization: Illinois Healthcare and Family Services	Contact Name:	Scott Slater
	Contact Title:	Public Service Administrator
Customer Address: 201 South Grand Avenue, East, Springfield, Illinois 62763	Contact Phone:	207-624-4167
	Contact Email:	Scott.Slater@illinois.gov

Project Information	
Total Vendor Staff:	**10**
Project Objectives: Implementation of electronic asset verification solution PCG portal used to verify the resources of ABD applicants and beneficiaries.	
Project Description: Asset Verification Services (AVS)	
Vendor's Involvement: PCG managed the design, implementation and operation of an eligibility verification web application linking Medicaid applicants and recipients with the financial resources they own to enhance the agency's ability to make resource-based eligibility determinations and redeterminations. LexisNexis provided the property data used.	
Project Benefits: Timely, streamlined, electronic bank responses, ability to discover undisclosed bank accounts, large increases/decreases bank balance alerts, over/under program resource designation	

Key Personnel	
Name: Kalen Summers	Role: Project Manager
Name: Brenda Baldwin	Role: Operations Manager
Name: Joshna Bachuwar	Role: Head Developer
Project Measurements:	
Estimated one-time costs: $858,550	Actual one-time costs: $858,550
Reason(s) for change in one-time cost: n/a	
Original Value of Vendor's Contract: $27,500,000	Actual Total Contract Value: $27,500,000

Attachment C
2024-PRMP-MES-AVS-005

Reason(s) for change in value: n/a				
Estimated Start & Completion Dates:	From:	09/2018	To:	01/2019
Actual Start & Completion Dates:	From:	09/2018	To:	01/2019
Reason(s) for difference between Estimated and Actual dates: n/a				
If the vendor performed the work as a Subcontractor, the vendor should describe the scope of subcontracted activities:				

Attachment C
2024-PRMP-MES-AVS-005

Subcontractor Reference Form

Subcontractor Information		
Vendor Name: Transunion	Contact Name:	**Joshua Ledgerwood**
	Contact Phone:	**720-237-4749**
Customer Information		
Customer Organization: Maine Department of Health and Human Services	Contact Name:	Jamie Pruitt
	Contact Title:	Associate Director
Customer Address: 109 Capitol St., Augusta, ME 04330	Contact Phone:	207-624-4167
	Contact Email:	Jamie.Pruett@maine.gov
Project Information		
Total Vendor Staff:	**10**	
Project Objectives: Implementation of electronic asset verification solution PCG portal used to verify the resources of ABD applicants and beneficiaries.		
Project Description: Asset Verification Services (AVS)		
Vendor's Involvement: PCG managed the design, implementation and operation of an eligibility verification web application linking Medicaid applicants and recipients with the financial resources they own to enhance the agency's ability to make resource-based eligibility determinations and redeterminations. TransUnion provided the motor vehicle data the system used.		
Project Benefits: Timely, streamlined, electronic bank responses, ability to discover undisclosed bank accounts, large increases/decreases bank balance alerts, over/under program resource designation		
Key Personnel		
Name: Kalen Summers	Role: Project Manager	
Name: Dave Bogan	Role: Operations Manager	
Name: Joshna Bachuwar	Role: Head Developer	
Project Measurements:		
Estimated one-time costs: $196,000	Actual one-time costs: $196,000	
Reason(s) for change in one-time cost: n/a		
Original Value of Vendor's Contract: $510,400	Actual Total Contract Value: $510,400	

Attachment C
2024-PRMP-MES-AVS-005

Reason(s) for change in value: n/a				
Estimated Start & Completion Dates:	From:	04/2017	To:	06/2017
Actual Start & Completion Dates:	From:	04/2017	To:	06/2017
Reason(s) for difference between Estimated and Actual dates: n/a				
If the vendor performed the work as a Subcontractor, the vendor should describe the scope of subcontracted activities:				

Attachment C
2024-PRMP-MES-AVS-005

Subcontractor Reference Form

Subcontractor Information		
Vendor Name: Accuity	Contact Name:	**Jason Balaban**
	Contact Phone:	**847-933-5076**
Customer Information		
Customer Organization: Colorado Department of Healthcare Policy and Finance	Contact Name:	Laurie Rudyk
	Contact Title:	Eligibility Contract Manager
Customer Address: 303 E 17th Ave. Suite 1100, Denver, CO 80203	Contact Phone:	303-866-2993
	Contact Email:	laurie.rudyk@state.co.us
Project Information		
Total Vendor Staff:	**10**	
Project Objectives: Implementation of electronic asset verification solution used to verify the resources of ABD applicants and beneficiaries.		
Project Description: Asset Verification Services (AVS)		
Vendor's Involvement: Accuity provided oversight and maintenance of the financial institution network used for AVS		
Project Benefits: Timely, streamlined, electronic bank responses, ability to discover undisclosed bank accounts		
Key Personnel		
Name: Jason Balaban	Role: Project Manager	
Project Measurements:		
Estimated one-time costs: $194,500	Actual one-time costs: $194,500	
Reason(s) for change in one-time cost: n/a		
Original Value of Vendor's Contract: $611,500	Actual Total Contract Value: $611,500	
Reason(s) for change in value: n/a		

Attachment C
2024-PRMP-MES-AVS-005

Estimated Start & Completion Dates:	From:	05/2017	To:	06/2018
Actual Start & Completion Dates:	From:	05/2017	To:	06/2018
Reason(s) for difference between Estimated and Actual dates: n/a				
If the vendor performed the work as a Subcontractor, the vendor should describe the scope of subcontracted activities: Vendor provided oversight and maintenance of the financial institution network utilized for AVS				

4. SCOPE OF SERVICES / RESPONSE TO STATEMENT OF WORK

On the following pages, PCG has first reiterated each requirement found in section 3 of the RFP and we have subsequently detailed how we will meet or exceed each requirement.

4.1 System Functionalities and Capabilities

1. Please detail your company's compliance with the AVS Requirements. Please clearly describe how each requirement is met.

On the following pages, PCG has articulated how our AVS complies with each requirement found in section 2.3 of the RFP:

2.3 - 1 The Vendor shall ensure the highest level of security and shall comply with the Health Insurance Portability and Accountability Act (HIPAA); the AVS must meet at a minimum the following standards: SAS 70, National Institute of Standards and Technology (NIST) guidelines, Mars-E 2.0 framework.

PCG recognizes that having a robust security program is critical in minimizing the impact of threats inherent in today's workplace and computing environments. We are committed to maintaining a healthy process of periodic audit and review of our program to assure that we are accomplishing our, and our clients', goals and objectives in protecting sensitive data and to assure that we evolve and adapt to address an ever-changing environment and threat landscape over time.

PCG is a MARS-E 2.0–compliant firm governed by annual SOC2 Type II audits and corporate information security controls based on NIST 800-53 v.5 standards. PCG manages sensitive PII and/or PHI across more than 1,000 active agency projects. For

over 35 years, we have succeeded in ensuring the security of our clients' sensitive data. PCG takes necessary steps to:

- Ensure appropriate protections and controls are developed and followed.
- Apply appropriate standards such as those outlined in NIST 800-53, MARS 2.0, ISO 27001, FedRamp, etc.
- Comply with pertinent regulations (e.g., HIPAA, FERPA, FIPS 140-2, FISMA, MARS-E, etc.) governing the access to protected data.

PCG is evaluated at least annually by a third-party audit firm in good standing to validate the effectiveness of our security and compliance posture and all solutions in place. These evaluations compare PCG's security and compliance policies and standards to its operational effectiveness to validate that documented actions are being performed as required. Additionally, the evaluations determine whether PCG is aligned with various assessment frameworks, such as SOC1 and SOC2. On an annual basis, PCG receives a SOC2 Type II attestation from a certified auditing firm in good standing, Alexander Aronson Finning CPAs (AAFCPAs). PCG maintains records of these attestations on file for review.

PCG's AVS is hosted in a virtual private cloud in AWS, deemed FedRAMP-moderate. PCG's AVS is a MARS-E 2.0–compliant solution and both PCG and our AWS cloud are governed by annual SOC2 Type II audits and corporate information security controls based on NIST 800-53 v.5 standards.

All user activity is logged and tracked via native AWS tools, as well, and PCG maintains security policies that restrict staff access to production environments and sensitive data. PCG uses a web application firewall (WAF) to control network traffic and encrypts data both in transit and at rest. Data is encrypted before being uploaded to S3 storage and is further protected by S3 server-side encryption. PCG also employs automated application security testing (DAST and SAST) throughout any engagement.

All requests to PCG's load balancer go through our firewall and any unauthenticated requests are blocked here. PCG's load balancer listens only to HTTPS (443) connections and routes requests to our web server. PCG's lambda functions access our database internally inside our private subnet. PCG's memcached server is in a private subnet and only listens to our web server. PCG's database (primary and secondary) are in a private subnet and data is encrypted via AES 256.

2.3 - 2 The AVS must meet all the requirements in Section 1940 of the Social Security Act (42 U.S.C § 1396w.

42 U.S. Code § 1396w details state requirements related to adopting financial asset checks when determining eligibility for Medicaid Aged, Blind, and Disabled clients. Specifically, state asset verification systems are required to comply with the following standards:

- ***Request and response system must be electronic***: PCG's AVS connects our agency customers to financial data via a number of electronic methods, including nightly batch file exchanges, web services calls, and/or via our stand-alone AVS web application.
- ***System must be secure based on recognized industry standards***: PCG's AVS is a MARS-E 2.0–compliant solution governed by annual SOC2 Type II audits and corporate information security controls based on NIST 800-53 v.4 standards. PCG's AVS is housed in an AWS virtual private cloud deemed FedRAMP moderate.
- ***Must establish and maintain a database of FIs to participate***: For the 32nd time, PCG has partnered with Accuity on AVS and over the past 12 years we have established and retained what is—by a wide margin—the largest network of FIs in the United States today. Accuity's network of FIs includes more than 90 percent of the depository financial institutions in the United States.

- ***Requests must also be sent to FIs other than those identified by the applicant***: PCG's AVS allows our clients to access not only those FIs known to the them, but also sends every AVS request to all of the nation's largest FIs, as well as additional FIs located within geographic proximity of the applicant's address.
- ***Responses must include information on both open and closed accounts going back for a period of up to 5 years***: PCG not only provides 60 months of account balances in our responses from more than 99 percent of banks, we can also provide up to 12 additional months of account balances which may be necessary for those requests which are sent to PCG more than one month after application.
- ***AVS must provide evidence that the search was completed even if no assets are located***: PCG's AVS identifies requests resulting in both a balance and requests resulting in no accounts being found. In both cases, PCG returns the resulting response to the agency providing evidence that a search was completed.

As the country's leading AVS provider, PCG's AVS has been subjected to Federal scrutiny on dozens of occasions and has "passed" with flying colors each time.

2.3 - 3 The AVS must be able to interface with PRMP Eligibility System, in a format approved by PRMP.

PCG's AVS is fully configurable to allow PRMP to establish multiple connectivity methods, ensuring you can adopt the service via the most convenient method possible now, while maintaining the option to move to a more complex integration in the future. This can be accomplished through the following types of connections:

- **API** – PCG's AVS is available via a single PCG multiplexer API, based on either REST or SOAP with a JSON or XML Payload. This will allow PRMP to send a single, bundled request and—based on the composition of the request—PCG will

retrieve data from some combination of data sources and consolidate all applicable response data (as well as any verifications, flags, and/or eligibility recommendations which are employed) into a single call back to your eligibility system.

- **Batch** – PCG's AVS also accommodates periodic or scheduled batch file exchanges via SFTP and/or similar, which may be ideal for monthly renewals, including Medicaid ex parte renewals.
- **Stand-alone Web Application** – PCG also maintains a stand-alone AVS web application to allow PRMP to access the service independently. In the event the state employs this option, PCG can work with your SSO personnel to exchange meta data and public key certificates in support of an SSO implementation with your active directory.
- **On-screen HTML Reports** – PCG can post encrypted data to a PCG provided URL which will use an authentication token from PRMP to validate the user, process the request, and return data in a HTML report which is accessible to your workers from within your system (even though PCG is hosting the report). This will allow you to forego any changes to your eligibility system while still getting access to PCG's results on your workers' screens.
- **PDF Auto-export** – PCG can also automatically export each client's results to PRMP via SFTP and use a file naming convention to support you in automatically uploading each PDF to the appropriate case file in your eligibility system.

Regardless of the implementation method chosen, PCG can return the following information for each individual processed through our asset verification service—for every configured assistance program being evaluated for eligibility:

- All input data
- All raw data received from third-party sources
- All employed data matches (optional)
- The results of each data match and its impact on eligibility (optional)

- Eligibility recommendations and the reason(s) why or why not for every configured assistance program (optional)

PCG agrees to customize the output to only provide the information that is most useful to PRMP, upon request.

2.3 – 4 The AVS shall be a secure web-based Vendor hosted solution. Cannot utilize paper-based verification. The system must have the capability to provide for both electronic submission and receipt responses.
a) Allow for secure electronic transmission of requests and responses from and to PRMP.
b) Ability to send secure verification inquiries electronically via the Internet or similar means from PRMP to the Financial Institution.
c) Accept requests from PRMP and responses from FIs electronically via internet or similar means.

PCG's AVS includes more than 90 percent of the financial institutions in the United States and nearly 700 in Puerto Rico and over 99 percent of Accuity's AVS responses from FIs are received electronically. However, because Accuity has access to over 90 percent of the more than 100,000 FIs in the United States—compared to our competitors who only have access to the Early Warning national network of the approximately 10 largest banks—there may be rare instances where rural, small FIs may be unwilling or unable to process responses electronically, despite our efforts to recruit them into our AVS web service.

It is important to note that our AVS will always interact with the State electronically, even if we are forced to wait for a manual response from one of our small, rural FIs. PCG feels it is important to allow these FIs to participate in the program so that there is no "safe haven" for undisclosed assets. Only the PCG Team is fortunate enough to have this "problem" due to our access to over 90 percent of the FIs nationwide.

2.3 - 5 The AVS and customer service support will be available to all users for utilization and accommodate any transaction volume during business hours.

A primary differentiator between PCG and our competitors is PCG's emphasis on client service. PCG's team members are trained extensively to prioritize client needs and issues immediately upon identification/receipt, to keep our agency clients informed every step of the way while we address these needs, to resolve these issues as soon as humanly possible and to provide transparent reporting around each issue, including root-cause analyses within 24 hours.

Put simply, PCG is well known for our exceptional client and customer service. So much so, in fact, that dozens of states **utilize more than 1,000 inbound and outbound PCG service representatives every day.** Leveraging three decades of call center operations and customer support experience, as well as industry-leading telephone and CRM technologies, PCG offers the following support options, the combination of which ensure PRMP and your employees are supported with transparent and timely services throughout this engagement, including:

Support Type	Description
High-Priority Technical Support	PCG's technical leadership team, led by our Technical Manager, Naresh Kommineni, will be available to PRMP for the duration of this engagement. Additionally, all PCG project team members will be available to PRMP to receive requests for technical support throughout this engagement. All reported technical support issues are logged within PCG's Team Foundation Server (TFS) and tracked and reported on until resolution. Finally, PCG's core AVS technical team has been

Support Type	Description
	together since 2016, ensuring PCG is able to rapidly deliver resolutions to any unforeseen technical issues.
AVS Help Desk	Additionally, PCG offers live technical support available via a dedicated phone number, fax, and a help email inbox. All reported technical issues are tracked within PCG's TFS issue resolution software. PCG offers a dedicated support email address and phone number to allow PRMP workers to report system and data errors. PCG technical support professionals can coordinate with call center staff, as necessary, to ensure timely and satisfactory resolutions to worker issues and/or concerns. PCG's help desk will be available, at minimum, during all PRMP business hours, including overtime hours.
Consumer Dispute Resolution/FCRA Support	PCG's proposed solution fully complies with the Fair Credit Reporting Act (FCRA). PCG maintains a consumer dispute resolution help desk, which allows PRMP clients to dispute information provided by any of our FCRA data sources. PCG understands and complies with each public assistance clients' right to obtain their data file and right to dispute any inaccurate information. PCG provides dispute intake, dispute documentation, dispute communication with third-party data providers, and dispute resolution solutions, which are accessible to your public assistance clients.
Project Management Support	PCG's Project Director, Project Manager, and Associate Project Manager are available via phone and email at any time should PRMP management have questions or concerns. Our staff will also be available for in-person consultations at any time with reasonable notice.
FI Help Desk	PCG will provide live support to financial institutions either enrolled in or being recruited for your AVS program. This support will be available via phone and email during normal business hours. PCG

Support Type	Description
	financial institution support professionals can coordinate with PRMP call center staff, as necessary, to ensure timely and satisfactory resolutions to worker issues and/or concerns.

Figure 11.0: Help desk program support functions. Our help desk will offer PRMP technical and project management support throughout the duration of the engagement.

With extensive experience in managing and operating call centers in several states across the country for more than 30 years, PCG can immediately staff this project with experienced help desk specialists. PCG will always work with PRMP to establish reasonable resolution timeframes, and we agree to be subject to negotiated financial penalties in the event we cannot meet the reasonable, target resolution timeframes.

2.3 - 6 The Vendor shall ensure seamless coordination between Medicaid, FIs, state agencies and other systems, as necessary.

The beauty of hiring PCG to provide asset verifications services is partially due to the fact that we take the responsibility of coordinating with financial institutions completely off of your plate, so you don't have to deal with it. Specifically, we accomplish this via the following most common measures:

- **FI Recruitment**: The PCG Team will engage each Puerto Rico-based FI and attempt recruit them the other 676 Puerto Rican banks who are already participating.
- **FI Development**: The PCG Team will work with all participating FIs to transition them from slower, manual response methods (e.g., fax) to faster, more automated response methods (e.g., API or batch).

- **FI Follow-up**: The PCG Team will automatically follow-up with any FIs who have not responded to an AVS request within 10 days, and we will periodically follow-up with any FIs exhibiting regular response delays.
- **FI Discrepancy Resolution**: The PCG Team will engage FIs on any occasions, albeit rarely, when the data reported through AVS doesn't match what a client is presenting via a physical bank statement or similar. To track this, PCG also maintains a "Discrepancy Log" on behalf of each of our AVS clients. PCG shares this log with both the agency and Accuity and provides the agency with weekly status updates on any outstanding discrepancies. We will do the same on PRMP's behalf, as well.

Further, because PCG's AVS is a component of PCGOne, PCG can enhance PRMP's ability to share data across agencies and systems and to use data for not only Medicaid eligibility purposes, but for other assistance programs and end-use cases, as well.

A key advantage of employing an AVS vendor who has successfully done this 30 other times is that our processes and protocols have been repeatedly tested, refined, and proven to streamline coordination among the various stakeholder groups involved in an asset verification system deployment.

2.3 - 7 The Vendor must provide training and customer support to Medicaid and FI staff.

PCG has successfully trained tens of thousands of agency eligibility workers over the past ten years using multiple approaches and tools, both in-person and virtually. During the new contract kickoff phase, PCG will work with PRMP to develop a formal Training Plan governing any required training activities.

Specifically, PCG's Training Plan will address each of the following key training considerations:

Plan Component	Description
Location and Tools	PCG will collaborate with PRMP to determine whether trainings should be facilitated through PCG's existing Learning Management System (LMS) and/or via another approach, including whether any in-person training is required.
Methodology	PCG will collaborate with PRMP to define the methodology for training, including determining whether PCG will rely on automated, Web-based, interactive trainings and/or will employ a hybrid training approach that includes activities outside of the LMS.
Roles and Responsibilities	PCG will collaborate with PRMP to define our role in the training process, including identifying who will be responsible for training communications and scheduling. PCG will identify each training stakeholder, including any agency contractors, and their specific roles and responsibilities in the training process.
Training Objectives and Courses	PCG will collaborate with PRMP to define your training goals and which training topics are required, including FCRA, user access and roles, new data sources, and more.
Training Times and Review Timelines	PCG will finalize the training materials review process for the development of all training materials and corresponding documentation. PCG will define this approach within our Training Plan. PCG will also define the estimated amount of time needed for each training course.
Training Update Protocols	PCG will collaborate with PRMP to define the protocols for updating training materials, including any updates required as a result of a system release/change.
Training Support	PCG will define technical and non-technical training support options and contact methods.

Plan Component	Description
Training Artifacts	PCG will catalogue all training documents, materials, sites, and equipment used on the training process. PCG anticipates storing these artifacts within our Asset Verification Program project SharePoint site, which will be accessible to PRMP throughout the engagement. Additionally, PCG will provide PRMP with a user guide to support and inform training and production activities.
Training Testing and Compliance	PCG will collaborate with PRMP to define the requirements for testing and certifying training materials, preparing training locations (including virtual locations), recording, and ensuring ADA-compliance.
Checklists and FAQs	PCG will collaborate with PRMP to define training instructor checklists, develop frequently asked questions documentation, and any post-training activities.
Training Access	PCG will define how trainees will access PCG trainings, including how to access PCG's training environment.

Figure 12.0: PCG will work with PRMP to define and execute any needed user training.

On behalf of several other PCG HHS agency asset and eligibility verification clients, PCG designed and deployed a web-based Learning Management System (LMS) for agency workers requiring training. PCG developed web-based training, including automated quizzes after each section of the training, as well as web-based final exams. PCG can leverage this LMS as directed by PRMP to facilitate and track trainings. Using an LMS to facilitate training on system updates, enhancements, and modifications will also allow your workers to take the training at their convenience.

PCG's financial asset data provider, Accuity, also trains financial institutions as they are onboarded into Accuity's AVS financial institution network. Training topics include:

- Registration
- Options for accessing AVS requests (e.g., batch, API, web, etc.)
- Lookback period expectations
- Request fulfillment timeliness expectations
- Confidentiality
- Automated reminders
- Support

The combination of PCG and Accuity's trainings will ensure Puerto Rico, and your AVS FI network, are fully informed and supported throughout this engagement.

2.3 - 8 The AVS shall match information concerning both open and closed accounts for a five-year (60-month) lookback period from the date determined by PRMP and will report the open/close dates if applicable.

Within each AVS request, PRMP can define the lookback period. For example, PRMP may want 60 months on new applications but may only want 12 months when redetermining eligibility. Regardless, the PCG Team's network of FIs are trained to provide up to five years of account balances in response to any AVS request. PCG's AVS allow PRMP to (a) request 60 months of account balances every time, (b) designate the number of months within each request, or (c) have PCG configure our solution to request 60 months on new applications and 12 months on renewals.

a) The AVS shall match identifying information, including a cross-reference from other customer names provided by the state, to determine if any such information appears or appears on any account as a single or joint owner.

FIs participating in PCG's AVS identify all account holders attached to any specific account, ensuring that PRMP will understand who holds each account and the

subsequent potential impact on resource-based eligibility. This will allow PRMP to identify resources associated not only with the specific input client, but also with any applying and non-applying spouses.

b) The AVS shall include all possible accounts that a person has a connection to by the recipient's name or SSN, including checking, savings, investment accounts, individual retirement accounts, treasury notes, certificates of deposit, annuities and any other assets that may be held or managed by a FI specified by regions in geographic search requests.

The PCG Team's Financial Institution Network is trained to provide account balance information for both open and closed accounts for up to five years, including for the following account types: annuities; CDs; checking; savings; custodial; trusts; burial funds; IRAs; money market; social security; keoughs; rent securities; Christmas clubs, and other depository account types.

c) The AVS shall allow state-initiated verification requests to be sent to FIs other than those identified by the applicant or recipient. The AVS must provide an option for state staff to submit and receive a response for specified FI requests.

In addition to our national and local account searches, PCG's AVS will allow your authorized users to request account lookups at any specific participating FIs anywhere in Puerto Rico or the United States. Directed account searches can be prompted by either your eligibility system or the users themselves. Combined with our national and local search, this functionality ensures that PCG's AVS clients can electronically verify most known accounts maintained by your clients while also identifying previously undisclosed assets potentially impacting eligibility.

d) The AVS shall provide for the matching of assets to include FIs located outside Puerto Rico.

In addition to supporting verification requests to any specific FI, PCG's AVS also executes each of the following searches in response to any request.

1 **National Account Search**: PCG processes all AVS requests through the Early Warning national database of accounts held at the nation's largest FIs to identify any account maintained by a consumer at any of the nation's largest FIs anywhere in the United States. These FIs represent more than 50 percent of the depository accounts in the United States and allow PCG to quickly verify the existence of any applicant/beneficiary account at any of the FIs in the United States. One hundred percent of all PCG AVS cases are processed through this national network of FIs to ensure PCG's coverage is as comprehensive as possible.

As a no-cost enhancement, PCG is also expanding our national bank search to include up to 32 FIs, more than doubling the number that was previously available (national search previously included 13 FIs). These newly added FIs are regionally significant and will typically respond to asset verification requests within 24 hours. Additionally, because these FIs have been added to the national account search, if no accounts are found, they will not be included in the local financial institution search portion of the detection process, thus allowing the local geographic search to focus on FIs with a higher probability of holding account information for the benefits applicant.

2 **Local Account Search**: At the same time, PCG also utilizes a geographic search application to identify local and regional FIs most likely to maintain a client account based on logic such as geographic proximity to the client's address. PCG utilizes Accuity's Geographic Undisclosed Account Radial Detection solution, or GUARD, as the mechanism that determines logic by which asset verification requests are to be distributed to local and regional FIs. GUARD utilizes various FI databases and proprietary logic to

optimize the probability of identifying FIs specific to a search for financial assets owned by an individual benefits applicant/beneficiary, primarily by looking at the geographic location of the FI compared to the address of the client.

2.3 - 9 The Vendor shall have an established network of FIs and state agencies who will participate in the AVS and have arrangements with the FIs; including any entity that accepts direct payment from an established private company, state or federal agency such as types of investment firms for IRA's, annuities, mutual funds, etc. The network shall include matching FIs located outside Puerto Rico. The vendor shall have an established system for recruiting FIs and will be able to communicate with PRMP whether or not they accept.

PCG's AVS FI network includes more than 90 percent of the FIs in the United States, as well as 671 participating Puerto Rico-based bank branches representing 183 of Puerto Rico's 188 FIs, including the following FIs, each of whom maintain at least five branches in Puerto Rico:

- Banco Popular de Puerto Rico
- FirstBank Puerto Rico
- Oriental Bank
- Cooperativa de Ahorro y Credito de Arecibo (COOPACA)
- Baxter Credit Union
- Cooperativa de Ahorro y Credito Las Piedras
- Cooperativa de Ahorro y Credito Vega Alta (VEGA-COOP)
- Cooperativa de Ahorro y Credito Roosevelt Roads
- Puerto Rico FCU
- Cooperativa de Ahorro y Credito de la Asociacion de Maestros de Puerto Rico (EDU-COOP)
- VAPR Federal Credit Union
- Cooperativa de Ahorro y Credito Oriental

- Cooperativa de Ahorro y Credito La Puertorriquena
- Cooperativa de Ahorro y Credito de Manati Inc
- Cooperativa de Ahorro y Credito Maunabo (MAUNA-COOP)
- Cooperativa de Ahorro y Credito la Sagrada Familia
- Cooperativa de Ahorro y Credito Naguabena
- Cooperativa de Ahorro y Credito de Barranquitas (CREDICENTRO-COOP)

PCG has included a complete list of participating Puerto Rico-based FIs as ***Appendix 2*** of this proposal.

PCG's AVS data provider and subcontractor, Accuity, has a 15-year history of working with FIs in the asset verification marketplace. Accuity has an established system for continuously recruiting FIs in Puerto Rico and across the United States to join and expand its network. Our FI recruitment approach includes the following objectives:

- Build on the established and committed base of FIs currently participating in FI network both in the United States and in Puerto Rico.
- Communicate with FIs, as follows:
  1. Once again inform FIs that Accuity will continue to provide asset verification services for PRMP.
  2. Review procedures and options for accessing the PRMP-specific asset verification requests.
  3. Confirm the current information stored in Accuity's Financial Institution Database and make necessary revisions.
  4. Encourage each FI to register for Accuity's automated web service in order to expedite response times.
  5. Provide ongoing FI education and support.

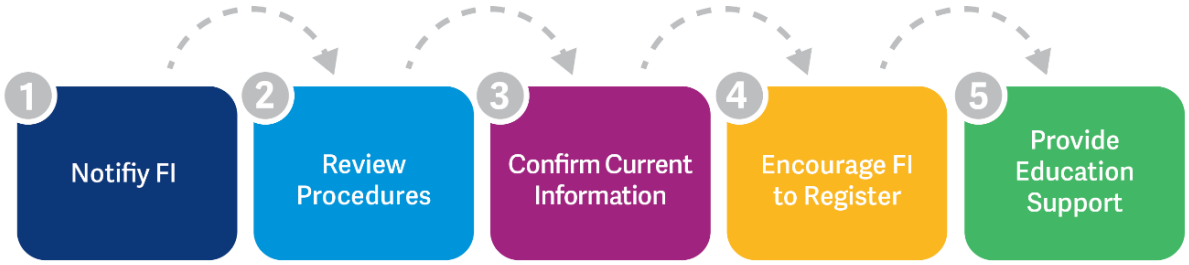


Figure 13.0: The PCG Team's Recruitment Overview. Our process will build on the established and committed base of FIs currently participating in Accuity's AVS FI Network in Puerto Rico.

Additionally, the PCG Team constantly works with financial institutions to, first, recruit them into participating and, second, recruit them from manual response methods such as mail or fax to faster, more automated response methods like API, batch, or web-based submissions.

Specifically, after go live, the PCG-Accuity team will continue to work with all of the FIs in to ensure successful participation in your AVS program, as follows:

- Continue to maintain a centralized processing workflow for all branch and subsidiary locations associated with the FIs or processing centers.
- Continue to maintain relationships with FI decision-makers and primary/secondary contacts to expeditiously solve problems during ongoing operations.
- Continue to encourage FI conversion to more expeditious response methods, including web, batch, and API-based response mechanisms.
- Continue the use of automated outreach in the event of an overdue request and/or a pattern of late responses. PCG agrees that any outstanding requests that have not been fulfilled within ten business days will result in us initiating contact with the financial institution in question to solicit an expedited response.
- Continue to review FI procedures for accessing asset verification requests and for submitting asset verification responses, as needed.

- Continue to encourage FI participation via the head office or processing center, rather than via individual branches.

PCG will also continue to communicate with the FI community during the implementation phase of this engagement in an attempt to recruit the remaining manual FIs (i.e., responding via mail or fax) to more expedited and/or automated response processing.

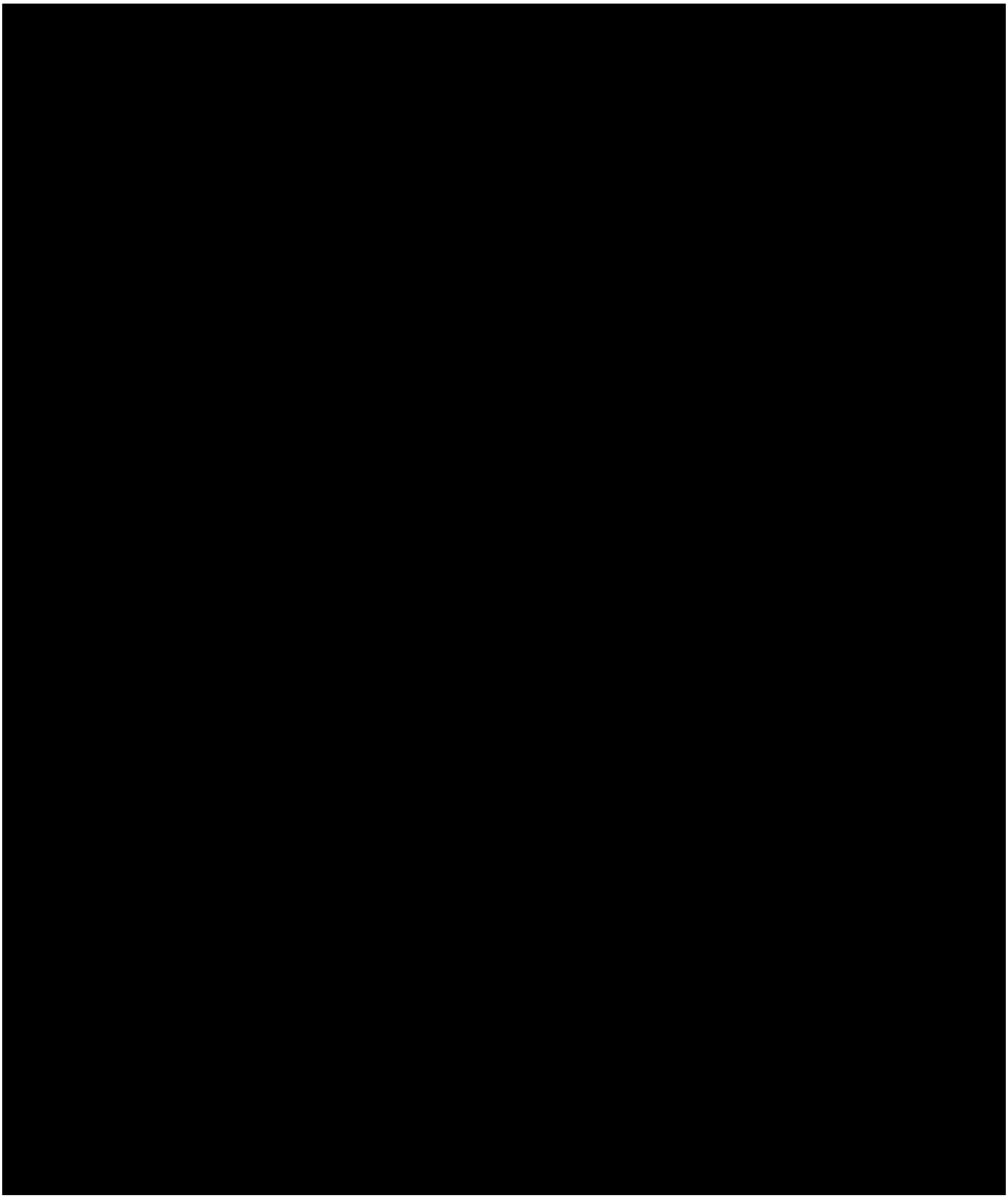
Further, PCG will provide a monthly financial institution participation file listing all participating FIs—including the name, address, and Financial Institution ID of each. PCG will submit this file to PRMP by the 20th calendar day of each month and will include contact information with this submission in the event PRMP has any questions or concerns.

2.3 - 10 FI verifications used to determine and or redetermine eligibility must be available for inspection and produced for administrative purposes to include subpoenas, hearings and supervisory review during the contract period as well as after completion of the contract.

In response to this proposal, PCG is offering PRMP both an AVS web service, as well as a standalone AVS web application. The latter will be populated with all requests and responses coming from both the web service and the web application. This will ensure that your staff can access all AVS cases, including responses which informed eligibility determinations, at any time, at the push of a button.

Should PRMP prefer, PCG can also pull any of this information from our database at any time, upon request.

2.3 - 11 The AVS shall allow for verification requests to be sent to disclosed FIs or possible undisclosed FIs as determined by the state.



2.3 - 12 At a minimum, the AVS must support a peak load of no fewer than 300 sessions.

PCG's AVS is housed in a virtual private cloud in AWS and leverages AWS's auto-scaling solutions, incorporating Aurora database, API Gateway, and Elastic Beanstalk, and offers a robust and adaptable infrastructure. Aurora, a fully managed relational database service, can easily scale horizontally to handle increasing workloads by adding more storage or computing resources. API Gateway acts as a front door, managing and securing API traffic. Its scalability is ensured through auto-scaling features that adjust capacity based on demand. Elastic Beanstalk, a PaaS service, simplifies the deployment and management of web applications. It can automatically scale applications based on metrics like CPU utilization or request rate, ensuring optimal performance and resource utilization. This combined architecture provides a highly scalable solution that can accommodate growing user bases and fluctuating workloads.

As evidence, our system has been stress tested successfully at 10,000 concurrent users for 30 minutes and we maintain recent successful implementations where data footprints have exceeded 30TB of client and source data.

2.3 - 13 The AVS system must receive regular maintenance, including security and "bug fixes" in a non-intrusive fashion during normal Medicaid business hours.

PCG employs a number of internally developed and native AWS tools to ensure constant uptime. PCG employs off-hours maintenance scheduling and AWS Lambda task management systems to trigger the execution of after-hours tasks. AWS managed services ensure system availability, while eliminating the need for system downtime for updates and/or maintenance and ensuring regular security patching, certificate updates, and more.

In the unlikely event that maintenance become necessary, PCG agrees to notify PRMP a minimum of seven days in advance of a planned outage and to perform this maintenance after hours to prevent it from impacting our system's availability.

2.3 - 14 The Vendor must implement any changes to the secure web portal solution that are required by CMS or law, which must be done at no cost to PRMP.

PCG agrees to implement any changes which are required by CMS or law at no cost to PRMP provided these changes are not outside of the intended scope and/or utilization expectations established by the RFP.

2.3 - 15 The vendor-hosted solution facility must be secure and redundant.

PCG utilizes a virtual private cloud in AWS, deemed FedRAMP moderate, to house our AVS and to backup and store all project data. The AWS Elastic Block Store (Amazon EBS) provides persistent block level storage volumes for use with Amazon EC2 instances in the AWS Cloud. Each Amazon EBS volume is automatically replicated within its Availability Zone to protect from component failure, offering high availability and durability. PCG archives our databases per the following schedule:

1. Two active copies of the production database always (Ohio and N Virginia AWS Regions)
2. They are imaged hourly for 48 hours (we have 48 copies to roll back to)
3. Each daily image is archived for 30 days
4. Each weekly image is archived for 12 weeks
5. Each monthly image is archived for 52 weeks
6. Each quarterly image is archived for 3 years
7. Each yearly image is archived for perpetually

PCG also leverages the AWS CloudWatch solution to monitor PCGOne performance and alert PCG in real-time to any degradation of performance. PCG supplements this solution with proprietary monitoring tools which evaluate and report on system performance and availability every fifteen (15) to sixty (60) seconds, twenty-four (24) hours per day, seven (7) days per week. This solution monitors interface and server availability, usage, performance, and latency to detect any anomalous scenarios representing a potential issue in availability or performance and alerts systems personnel via both text message and email in the event a potential issue is detected.

2.3.1 To implement and effectively operate the AVS the Vendor must:
a) Establish a robust network for FIs.

As detailed previously, PCG's AVS FI network includes more than 90 percent of the financial institutions in the United States, as well as 671 participating Puerto Rico-based bank branches representing 183 of Puerto Rico's 188 FIs. Further, the PCG Team will continue to recruit additional Puerto Rico-based FIs during and after the implementation phase of this engagement.

b) Establish a robust network with state agencies.

In a number of states around the country, PCG manages the connections between other state agencies and each state's HHS eligibility system. These connections allow eligibility technicians to obtain additional information from each other which supports and informs more accurate eligibility determinations.

For example, in Texas, PCG established a robust network of state agencies sharing data with their Health and Human Services Commission (i.e., the division responsible for Medicaid and SNAP eligibility) that included the following data sources:

- Texas Workforce Commission (TWC)

- Texas Electronic Benefits Transfer (EBT)
- Texas Department of Criminal Justice (TDCJ)
- Texas Department of Public Safety (DPS)
- Texas Department of State Health Services
- Texas Department of Motor Vehicles (DMV)
- Texas Lottery Commission
- Texas Office of Attorney General Child Support (OAG)
- Texas Department of State Health Services (DSHS) Vital Statistics

PCG will do the same on PRMP's behalf and will establish connectivity with your Municipal Revenue Collection Center, Department of Transportation and Public Works, Office of the Commissioner of Navigation, and Bureau of Transportation and other Public Services, as prescribed in the RFP. Further, PCG will automatically and instantly evaluate results from each data source to quantify the potential ineligibility risk responses from each source represent.

c) Develop tracking tools and report on verification activity.

PCG's seasoned project managers understand the importance of ensuring our agency clients have the tools needed to easily track and monitor asset verification activities, users, and results throughout any engagement. PCG accomplishes this via each of the following tools, as described in the next section:

- Weekly Implementation Reports
- Monthly Performance Reports
- Ad hoc reports, as requested
- AVS Reporting Dashboard
- Communications Management Plan

Weekly Implementation Report

PCG's Project Manager and Associate Project Manager will lead weekly (at least) project status meetings during the implementation phase of this engagement and will be responsible for mapping PCG's actual activities and progress to our planned activities as defined in our work breakdown structure (WBS), reporting on the status of all implementation activities, highlighting any known or new potential risk and the corresponding mitigation strategies for addressing the risk, and reporting on planned next steps and sprint activities.

All of these topics will be formally memorialized via our Weekly Implementation Report, which we will deliver to PRMP by close of business on the Monday following each week. This report will include each of the following sections and topics:

Weekly Implementation Report	
Current Project Activities	This section will highlight all user stories which were initiated, worked on, and/or completed during the prior week.
Defects	This section will detail any new or outstanding defects, as well as their current statuses, assignees, and anticipated resolution dates.
Agency Interactions	This section will summarize all agency meetings and/or calls which took place the prior week, including a summary of the agenda and any notable outcomes and/or decisions.
Project Risk	This section will detail any know or potential risks, including a description of the risk, mitigation steps, and a contingency plan.
Project Issues	This section will detail any project issues, including a description of the issue, the root cause, and planned corrective actions.
Next Steps	This section will detail all activities and user stories which are expected to be addressed during the upcoming week.

Figure 15.0: Weekly Implementation Report

PCG will customize this report further to capture any other PRMP needs, upon request.

Monthly Performance Report

We will not only submit weekly implementation reports, but we will also submit a Monthly Performance Report to the State by the 10th day of the following month. PCG's monthly report will include the following report criteria, at minimum, and PCG agrees to supplement this report with any additional details PRMP requests.

Monthly Performance Report	
Transaction Report	This section will detail the number of transactions by data source, number of responses, and response timing of each response by data source.
Financial Institution Response Rate Report	This section will include an analysis of financial institution responses, including the number of requests, number of responses, average response time associated with each financial institution, accounts found, undisclosed accounts found, results from any analytics being employed, and more.
Usage Report	This section will detail usage of PCG's asset verification service, including by region, county, user, and program.
Project Management Report	This report will map the status of all PCG activities to milestones and completion dates from our project management plan to allow PRMP to monitor our progress each month (this information will also be available in real-time through the project SharePoint site).
Corrective Action Report	This section will detail any outstanding inquiries more than 25 days old and the corrective actions take to address this with FIs.
Risk Report	This section will catalogue all identified risks, mitigation strategies and activities, contingency plans, and the current status of each.
Performance Report	This section will detail any system outages and/or incidents, including when and how it was discovered, the time until it was reported to Tennessee, any system and operational impacts, and corrective measures to detect and prevent future outages and incidents.

Monthly Performance Report	
Issues Log	This report will detail all help and support activities, including the length of time from reporting to resolution, the status of all outstanding resolutions, and metrics on availability, response times, call and e-mail volumes, and more.
Discrepancy Log	This report will detail all pending discrepancies where PRMP identified AVS results which contradict physical statements.
Transaction Detail	This report will include all transaction details, including the request and response information associated with each request ID.
Performance Standard Compliance	This report will measure PCG's compliance with PRMP's performance standards, both over the life of the project and during the prior month.
Aging Summary	This report will summarize the status of all outstanding inquiries, including the number of days outstanding.

Figure 16.0: PCG's Monthly Performance Report is designed to give PRMP all of the information you need to evaluate PCG and report out on metrics that are important to the agency.

Ad Hoc Reporting

PCG also agrees to provide weekly or bi-weekly status reports, including any requested metrics and/or information, upon request. Finally, PCG also agrees to create and submit any ad-hoc reports and/or additional reports—including any urgently needed reports—requested by PRMP for the duration of this engagement. PCG will generate reports upon request and will provide these reports in the format of your choosing. PCG can modify our approach to reporting to include any additional data elements we maintain within our asset verification data warehouse to suit PRMP's needs.

AVS Reporting Dashboard

The web application version of PCG's AVS includes a fully configurable reporting dashboard, integrated with Amazon's QuickSight business intelligence and visualization

Communications Management Plan

PCG understands that consistent two-way communication is critical to the success of any asset verification system project. At the outset of this engagement, PCG will coordinate with the PRMP's team to establish a formal Communication Management Plan. PCG's Communication Plan will identify each internal and external project stakeholder, what they need to know, and when they need to know it. This plan will also define our communications and meeting schedule, assign responsibilities for communications, and identify each stakeholder's preferred means of receiving communications from PCG. Finally, PCG will define the PRMP's reporting requirements, the content of each report, and the timing of the report delivery.

The goals of PCG's approach to communications include:

- To promote project understanding, cooperation, participation, comprehension, and acceptance through timely and consistent two-way communications.
- To establish standards and protocols for communicating, including the method of communication, recipients, templates, and frequency of these communications.

- To identify project stakeholders, their preferred communications method, and to define which communications each stakeholder should be included on.

By achieving these goals, PCG will ensure PRMP is appropriately informed throughout this engagement, while allowing PRMP to effectively monitor PCG's performance and activities throughout.

For each written deliverable, including all reports, PCG will first deliver a template with an outline and sample contents. PRMP will have the opportunity to approve or reject the template, and PCG will follow the approved template when developing the final deliverable.

The combination of PCG's (1) Weekly Implementation Reports, (2) Monthly Performance Reports, (3) Ad hoc reports, as requested, (4) AVS Reporting Dashboard, and (5) Communications Management Plan will ensure PRMP has instant and transparent access to all PCG and AVS activities, performance, and results throughout this engagement.

d) Account for levels of system flexibility to accommodate current Medicaid eligibility data systems and future changes to those systems.

The PCGOne data platform that includes our asset verification service is fully configurable, ensuring PRMP can accommodate current and future Medicaid eligibility systems and approaches, for the following reasons:

1. **Flexible Connectivity Options**: PCG's AVS is fully configurable to allow PRMP to establish multiple connectivity methods. This can be accomplished through the following types of connections:

   - **API** – PCG's AVS is available via a single PCG multiplexer API, based on either REST or SOAP with a JSON or XML Payload. This will allow PRMP to send a

single, bundled request and – based on the composition of the request – PCG will retrieve data from some combination of data sources and consolidate all applicable response data (as well as any verifications, flags, and/or eligibility recommendations which are employed) into a single call back to your eligibility system.

- **Batch** – PCG's AVS also accommodates periodic or scheduled batch file exchanges via SFTP and/or similar, which may be ideal for monthly renewals, including Medicaid ex parte renewals.
- **Stand-alone Web Application** – PCG also maintains a stand-alone AVS web application to allow PRMP to access the service independently. In the event the state employs this option, PCG can work with your SSO personnel to exchange meta data and public key certificates in support of an SSO implementation with your active directory.
- **On-screen HTML Reports** – PCG can post encrypted data to a PCG provided URL which will use an authentication token from PRMP to validate the user, process the request, and return data in a HTML report which is accessible to your workers from within your system (even though PCG is hosting the report). This will allow you to forego any changes to your eligibility system while still getting access to PCG's results on your workers' screens.
- **PDF Auto-export** – PCG can also automatically export each client's results to PRMP via SFTP and use a file naming convention to support you in automatically uploading each PDF to the appropriate case file in your eligibility system.

This will ensure you can adopt the service via the most convenient method possible now, while maintaining the option to move to a more complex integration in the future.

The combination of this flexibility and configurability will ensure PCG's AVS can accommodate and support any future agency system or data requirements.

e) Process high volume transaction requests accurately and timely.

PCG's AVS is housed in a virtual private cloud in AWS and leverages AWS's auto-scaling solutions, incorporating Aurora database, API Gateway, and Elastic Beanstalk, and offers a robust and adaptable infrastructure. Aurora, a fully managed relational database service, can easily scale horizontally to handle increasing workloads by adding more storage or computing resources. API Gateway acts as a front door, managing and securing API traffic. Its scalability is ensured through auto-scaling features that adjust capacity based on demand. Elastic Beanstalk, a PaaS service, simplifies the deployment and management of web applications. It can automatically scale applications based on metrics like CPU utilization or request rate, ensuring optimal performance and resource utilization. This combined architecture provides a highly scalable solution that can accommodate growing user bases and fluctuating workloads.

As evidence, our system has been stress tested successfully at 10,000 concurrent users for 30 minutes and we maintain recent successful implementations where data footprints have exceeded 30TB of client and source data.

f) Ensure that each financial institution and state agency responds electronically.

PCG's AVS will always interact with Puerto Rico electronically, whether you are accessing it via a direct integration or via PCG's web application. However, because PCG's financial asset data provider, Accuity, includes hundreds of smaller and/or rural FIs across the United States who, to date, have not been able to connect via electronic means, PCG still includes these FIs in our AVS network to ensure PRMP has the most comprehensive access to FIs throughout this engagement.

The PCG Team constantly recruits FIs to move from slower, more manual response mechanisms (e.g., fax) to faster, more automated response mechanisms (e.g., API or

batch), and over time the number of FIs relying on manual response mechanisms declines as response times improve.

Nationally, 90 percent of PCG's responses are received within one day, 95 percent are received within five days, and 98 percent are received within 10 days.

2.3.2 Financial Institution Verification

2.3.2 - 1 The AVS must have the capacity to provide electronic submission of requests to financial institutions and electronic receipts of responses from financial institutions. The AVS must include:

a) Checking

b) Savings

c) Investment accounts

d) Individual Retirement accounts (IRA)

e) Roth IRA's

f) Treasury notes

g) Certificates of deposit (CDs)

h) Annuities

i) Other assets that may be held or managed by any Financial Institution.

The PCG Team's Financial Institution Network is trained to provide account balance information for both open and closed accounts for up to five years, including for the following account types: annuities; CDs; checking; savings; custodial; trusts; burial funds; IRAs; money market; social security; keoughs; rent securities; Christmas clubs, and other depository account types.

2.3.2 - 2 The System shall allow verification requests to be sent to financial institutions and state agencies other than those identified by the applicant or recipient.

2.3.2 - 3 The system shall provide an option for the Department or its designees to specify the financial institution(s) and state agencies to be included in the query.

In addition to our national and local account searches, PCG's AVS will allow your authorized users to request account lookups at any specific participating FIs anywhere in Puerto Rico or the United States. Directed account searches can be prompted by either your eligibility system or the users themselves. Combined with our national and local search, this functionality ensures that PCG's AVS clients can electronically verify most known accounts maintained by your clients while also identifying previously undisclosed assets potentially impacting eligibility.

2.3.2 - 4 The system shall provide for cross-state matching of assets to include financial institutions outside of Puerto Rico.

PCG processes all AVS requests through the Early Warning national database of accounts held at dozens of the United States' most significant FIs to identify any account maintained by a client anywhere in the United States. These FIs represent more than 50 percent of the depository accounts in the United States and allow PCG to quickly verify the existence of any applicant/beneficiary account at any of the FIs in the United States. One hundred percent of all PRMP requests will be processed through this national network of FIs to ensure PCG's coverage is as comprehensive as possible.

2.3.2 - 5 The system shall analyze the information gathered from the financial institutions to determine if the eligibility threshold was exceeded and or if a transfer of assets has potentially occurred based on criteria provided by Medicaid.

PCG's AVS be configured to instantly evaluate a client's eligibility for an unlimited number of assistance programs against the returned third-party data based on agency-defined eligibility criteria. This will allow PRMP to instantly verify resource-based eligibility using PCG's AVS based on your specific eligibility policy associated with every type of assistance + household size variation which is submitted.

2.3.2 - 7 The AVS must have the capability to search for and provide verification of assets that are owned by Medicaid applicants and recipients and/or their spouses. The AVS must electronically verify accounts held in financial institutions owned by the applicant or recipient and/or the applicant/recipient's spouse for the month of the application and 60-month retroactive period.

As articulated earlier, PCG's AVS includes the largest financial institution network in North America, including nearly 700 FIs based in Puerto Rico. Additionally, the combination of our national and local searches for undisclosed assets, as well as the verification search feature allowing PRMP to query any specific FI in the United States, provides Puerto Rico with the most comprehensive AVS available anywhere in the United States.

2.3.2 - 8 For individuals applying for Medicaid coverage of ABD the verification system must:
a) Verify the individual and the spouse's accounts held in financial institutions for the month of the application and the 60-month look-back period, and the months between

the application date and the request date, including accounts that were closed during this period. The information must include the account balance as of the first minute of the first day of the month, the average daily balance, and interest earned for each month of the look-back period.

PCG's AVS will allow Puerto Rico to not only request 60 months of account information, but also to request up to an additional 12 months in the event that the application date is one or months before the request date. This will ensure your eligibility workers have access to current account information through the month of the request date.

PCG's AVS includes the first minute of the month balance for every month of the lookback period, as well as interest, when the FI provides it. No AVS vendor in North America is able to provide the average daily balance, unfortunately.

b) Identify months in which a potential transfer of assets is detected as determined based on criteria approved by the State.

2.3.3.A Real Property Verification

- *Shall be able to search and verify real property by a combination of names, dates of birth or Social Security Numbers.*
- *Shall conduct searches on real property owned by the individual and or the individual spouse during the month of the application, including any property that was sold or transferred during this period.*

PCG is North America's most experienced property verification vendor, as evidenced by large-scale property verification engagements in Alaska, Connecticut, Delaware, Illinois, Maine, Maryland, Nebraska, New York, Rhode Island, South Dakota, and Texas.

On each of these engagements, PCG established a property interface connecting the agency to North America's most comprehensive property data source, LexisNexis's Benefit Assessment. Using the LexisNexis core strengths of unrivaled data sets, identity linking, and highly scalable technology, their **Benefit Assessment** data allows HHS agencies to confidently access the most comprehensive and relevant property data during your Medicaid enrollment process.

LexisNexis Benefit Assessment is driven by their extensive core database and their proprietary linking technology. Agencies will be able to apply massive amounts of data in an accurate and efficient manner and receive verified, accurate data relevant to your mission of determining eligibility more quickly and more accurately.

In Puerto Rico, LexisNexis maintains records on over two million Puerto Rico citizens in their database that is updated routinely by thousands of data sources. Unlike their mainland-based coverage which benefits from access to assessment and deed data from those states, in Puerto Rico LexisNexis and every other major data provider are reliant on non-property specific records, across several databases, that reference addresses in Puerto Rico. This allows for the potential identification of property associated with the client. As a result, property records can admittedly sometimes be dated. However, when combined with records PCG will obtain from Puerto Rico's Municipal Revenue Collection Center, PCG can obtain a comprehensive view of your clients' property ownership and sale history and ascertain its impact on potential Medicaid eligibility.

On the U.S. mainland, PCG's property search includes multiple processes that take place concurrently to identify all of the property assets maintained by applicants and beneficiaries:

Search	Description
Deed Search	PCG processes all AVS requests through the LexisNexis deed database containing millions of records updated on, at minimum, a bi-weekly basis and every time a property is purchased or sold.
Mortgage Search	PCG processes all AVS requests through the vast LexisNexis mortgage database containing millions of records updated on a bi-weekly basis and every time a property is purchased or sold.

Assessment Search	PCG processes all AVS requests through the LexisNexis assessment database containing millions of records updated on an annual basis or every time an assessment is completed.

Figure 28.0: PCG's Property Search Process on the U.S. mainland.

PCG will identify any property and real estate owned, or previously owned, by the client anywhere in the United States within the 60 months prior to the request. PCG's property responses typically, but not always, return the following data elements for each identified property:

- Assessed Value
- Market Value
- Address
- City
- State
- Zip
- County
- Deed Type
- Deed State
- Deed County
- Lender Name
- Lender DBA
- Contract Date
- Deed Sales Price
- Buyer Name
- Buyer Description
- Buyer Title
- Buyer Name
- Buyer Suffix
- Company Name
- Owner Name
- Owner Title
- Owner Suffix
- Owner Company Name
- Seller Name
- Seller Title
- Seller Suffix
- Seller Company Name

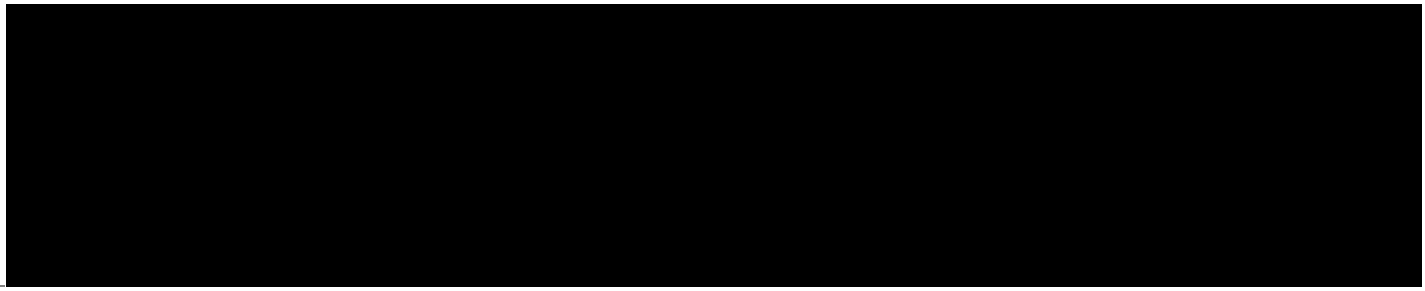
PCG's AVS will identify and flag any properties which were sold for significantly less than fair market value, based on a threshold which is configurable to PRMP. Many of PCG's AVS clients configure our solution to flag properties which were sold for less than 80 percent of the property's fair market value at any time during the five-year look-back period.

- *Shall be able to use the data from the Municipal Revenue Collection Center (Centro de Recaudaciones de Ingresos Municipales, CRIM) as a source of information that identifies the properties reported in the applicant's name. Similarly, use financial institutions for the same purpose through mortgage loans.*

Because PCG has implemented hundreds of third-party data sources into PCGOne, our team maintains the experience and expertise necessary to efficiently integrate data from the Municipal Revenue Collection Center into our AVS and to use this data to assist in the prediction of resource-based eligibility for Medicaid services.

While PCG's FI network provides the first minute of the month account balances during each month of the look-back period, PCG does not currently access mortgage loan information from financial institutions.

- *The system shall flag occurrences that meet the criteria in the system and electronically notify Medicaid through the AVS portal, and through the eligibility data system.*



PCG will simultaneously populate our AVS web application and PRMP's AVS web and/or batch request and response service with all received requests, responses, and supporting data and analytics.

2.3.3.B Vehicles

- *Shall be able to search and verify transportation property by a combination of names, dates of birth or Social Security Numbers.*
- *Shall conduct searches on vehicles owned by the individual and or the individual spouse during the month of the application, including any vehicles that were sold or transferred during this period.*

PCG, in conjunction with TransUnion [redacted] provides Motor Vehicle Ownership and Valuation data within our AVS. TransUnion maintains current and previously owned and sold motor vehicle records from, at minimum, 1996 to present day, in nearly every state in the country, **in addition to Puerto Rico**. [redacted]

There are three indisputable reasons why including motor vehicle ownership and valuation data to your AVS is sure to enhance your ability to ensure the integrity of your Medicaid program:

1. According to the U.S. Department of Transportation, every household in the United States owns an average of 1.9 cars[1].
2. Nearly every state in the country counts the current equity value of a second car as an asset when calculating the resource-based eligibility of public assistance applicants.

[1] https://www.statista.com/statistics/551403/number-of-vehicles-per-household-in-the-united-states/

3. The majority of states in the country accept client attestations regarding owned vehicles without ever electronically verifying the legitimacy of these attestations.

If many households own an average of 1.9 motor vehicles, this means that for, on average, 90 percent of your clients applying for public assistance programs with resource limits, they are never subject to a review of all of their countable assets—rather than just the financial and/or real estate assets—using third-party data.

PCG's motor vehicle data service typically returns the following data elements for each vehicle owned or sold by your Medicaid clients:

- Currently or Previously Owned Vehicles (i.e. Year, Make, Series, Model, Color, VIN, Body Style, Vehicle Type, Weight, Length, Height, Most Current Tag #, Tag Valid

to and from Dates, Doors, MSRP, Plant, Restraint Type, Drive Type, Fuel, Engine, Transmission, and Current Value)

- Title Holders (i.e. Name, Address, Date of Birth, Title Number, State Titled In, Original Title Date, and Title Transfer Date)
- Lien Holders; Lessors
- Registrant (i.e. Name, Registration Date, Date of Birth, and Address)
- Vehicle Tag History (i.e. License Plate and License Plate Valid from and to Dates)
- Vehicle First Seen Date
- Vehicle Last Seen Date

Once a user clicks the “Vehicle Information” tile, they will be taken to the summary results of our Motor Vehicle Ownership and Valuation search, as illustrated below.

Motor vehicle results will be returned in the same response call as financial and property asset results and will also be populated within the AVS web application at the same time.

PCG's motor vehicle search not only looks for vehicles owned in Puerto Rico, but also for vehicles which were owned or sold in the previous five years within the U.S. mainland.

- *Should be able to use the relevant data from the Department of Transportation and Public Works (Departamento de Transportación y Obras Públicas, DTOP) to corroborate vehicles registered in the applicant's name.*

- *Should use the relevant data to identify navigation vehicles, through the Office of the Commissioner of Navigation under the Puerto Rico Department of Natural Resources (DRNA).*
- *Should use the data provided by the Bureau of Transportation and other Public Services (Negociado de Transporte y otros Servicios Públicos, NTSP), to identify motor vehicles connected to a transportation network company, such as Uber. The Code of Regulations of the Bureau of Transportation and Other Public Services requires persons driving a vehicle connected to a transportation network company, such as Uber, to obtain authorization issued by that agency.*

Because PCG has implemented hundreds of third-party data sources into PCGOne, our team maintains the experience and expertise necessary to efficiently integrate data from Puerto Rico's Department of Transportation, Office of the Commissioner of Navigation, and Bureau of Transportation and other Public Services into our AVS and to use this data to assist in the prediction of resource-based eligibility for Medicaid services.

Additionally, PCG can employ similar flags to this data to highlight any scenarios representing potential ineligibility, including the ownership of multiple vehicles, vehicles valued above Medicaid asset limits, vehicles owned in the mainland United States, and more.

- *The system shall flag occurrences that meet the criteria in the system and electronically notify Medicaid through the AVS portal, and through the eligibility data system.*

- *The Vendor shall propose a response process to ensure requests and results are correct and instantly routed to the appropriate location/person, which is subject to approval by Medicaid.*

Depending on the integration method PRMP chooses, PCG can return responses using whatever mechanism and logic you prefer, including:

- **API** – PCG can return responses in real-time or can hold all responses throughout the day and return them each evening.
- **Batch** – PCG can bundle all responses received that day and forward them to the State via SFTP for ingestion into the State system.
- **Stand-alone Web Application** – PCG updates our AVS Portal on a nightly basis with all responses received that day.
- **On-screen HTML Reports** – PCG populates the reports with any data received within one minute and subsequently updates the HTML reports at day 5, 15, 30, and 60 if any new accounts are received during these time intervals.
- **PDF Auto-export** – PCG exports AVS reports with all accounts received that day to PRMP via SFTP each evening.

Regardless of the transmission method employed, each response contains a Request ID which corresponds to the Request ID the agency submitted with each request. This Request ID will allow the State to easily match responses received over a series of days to the initial request which generated the response. PCG reconciles requests against responses the same way when populating the AVS Web Portal.

Additionally, PCG can supplement this process by alerting PRMP in the event that additional accounts are received after a configurable timeframe. For example:

PCG agrees to work with PRMP to employ similar response methods and/or cadences upon award.

- *The AVS must provide documentary evidence that the search was conducted, and the specific financial institutions included in the query even if no assets or real property resources are found.*

In response to financial institution requests, queried FIs participating in PCG's AVS return "Account Found" or "No Account Found" responses to PCG in response to AVS requests. This provides the state with documentary evidence that the search was conducted, regardless of whether an account was found.

In response to real property requests, LexisNexis provides a request acknowledgment confirming that the request was queried and has resulted in a search for property currently or previously maintained by the client in the prior 60 days.

2.3.3.D Transition

Upon termination or expiration of the contract the parties agree to cooperate in good faith to effectuate a smooth secure transition of other services from the vendor to PRMP. Ninety days prior to the end of the contract or unless otherwise specified by PRMP, the vendor must begin working with PRMP to develop a Data Transition Plan (DTP).

PCG understands that it is critical that Puerto Rico can smoothly transition from one AVS vendor to another should it be necessary. PCG is committed to adequately documenting

all processes, as well as all business, functional, and technical requirements, to ensure the continuity of operations in the event of a change in vendor.

PCG will take necessary steps to:

- Document and maintain copies of all relevant data and reference tables, documentation, and other pertinent information necessary to take over and successfully assume operational activities, including all works in progress, and to provide this to PRMP upon request.
- Provide current inventories, correspondence, documentation of outstanding issues, and other operations support documentation to PRMP upon request.
- Transfer all written and electronic documentation, including work in progress pertaining to the business processes including but not limited to: work instructions, work process flows, system user instructions, process memos, plans, and any other materials used in the business process.
- Create and maintain documentation describing all relevant information regarding the data sources used within the verification service.
- Transfer all training materials in electronic format including but not limited to the training plan, training curriculum, training materials, and any in-progress training content.
- Completely transfer all of the above to PRMP and/or another entity, upon request.

Turnover Artifacts

PCG is committed to compiling, maintaining, and transferring all documentation and artifacts necessary to inform an incumbent vendor and allow them to expeditiously establish high-quality integrated state verification system services. PCG will electronically store all project requirements, documentation, and artifacts within the forthcoming SharePoint site, to be maintained by PCG and accessible to PRMP at all times. As requirements change and/or evolve, PCG will update project artifacts stored within this site. This SharePoint and ongoing document revisioning will ensure ongoing, transparent

agency access to project artifacts and will allow for appropriate version control, respectively.

Data Definition Artifacts

PCG will document and maintain the following artifacts and information for each data source being accessed by our verification service, unless prevented from doing so by third-party commercial data vendors, and for each process being generated by our asset verification service.

- Process name
- Data source(s)
- Technical requirements
- Sample file(s)
- Transmission protocol(s)
- Data source contact information
- Testing contact information
- Development contact information
- Encryption type and corresponding keys
- Connectivity requirements
- Implementation user stories, test scripts, and acceptance criteria
- Number of files, if applicable
- Specifications, WSDLs, and/or schema
- File transmission frequency, if applicable
- Full or incremental transmission indicator, if applicable
- Producer and processer of file indicator, if applicable
- Historical data (including but not limited to case history and data source history)
- Work in progress data, documentation, and requirements.

Reports Definition Artifacts

PCG will document and maintain the following artifacts and information for each report being accessed and/or generated as part of this engagement:

- Sample report (including ad-hoc reports)
- Report generation requirements
- List of report data elements and mapping of report data elements with element data source(s)
- Implementation user stories, test scripts, and acceptance criteria
- Work in progress data, documentation, and requirements

Operations Artifacts

PCG will document and maintain the following artifacts and information related to AVS operations:

- User guide(s)
- Training curriculum and materials
- Final knowledge transfer plan
- Post-turnover results report
- Operational protocols (i.e. any documented business processes instructing PCG staff operations)

Project Management Artifacts

PCG will document and maintain the following AVS project management artifacts:

- All project management reports
- All project deliverables
- Acceptance testing plan
- Data dictionary

Turnover Plan Components

PCG's turnover plan will include the physical, electronic and informal transfer of information to PRMP and/or the incumbent, as follows:

- **Physical Knowledge Transfer**: PCG will transfer historical data, per our contract's requirements, via an encrypted hard drive by delivering this in-person to PRMPs authorized designee.
- **Electronic Knowledge Transfer**: PCG will transfer the remaining artifacts to PRMP and/or the incumbent electronically via a secure-FTP site hosted by either PRMP or the incumbent.
- **Informal Knowledge Transfer**: PCG will make key project staff available throughout the transition process to support the incumbent and/or PRMP in locating additional information, performing staff training on-site at PRMP, and/or answering any questions either electronically, in-person at PRMP, and/or over the phone.

Turnover Staffing

PCG will support PRMP's transition to the incumbent vendor with the following key project staff:

- **Project Manager:** PCG's AVS Project Manager will be responsible for interfacing with PRMP and the incumbent and ensuring all turnover activities are tracked and completed. PCG's Project Manager will also coordinate the availability of additional project staff, as necessary, including technical, training, and executive staff.
- **Technical Manager:** PCG's AVS Technical Manager will serve as the technical lead and work with PRMP and/or the incumbent's technical team to ensure the successful transfer and interpretation of all turnover artifacts. PCG's Technical Manager will also ensure additional technical staff are available upon request.
- **Training Manager:** PCG's AVS Training Manager will work with PRMP and/or the incumbent to transfer training artifacts and information.
- **Additional Staff:** PCG will make available additional project staff and management as requested by PRMP for six months prior to any planned turnover to another vendor.

PCG agrees to provide a form Data Transmission Plan (DTP) at least ninety days prior to the end of the contract or unless otherwise specified by PRMP.

2. Describe how identifying information such as name, date of birth, social security number, and current and previous address must be submitted to and returned from an AVS electronically.

FIs require each client's name, date of birth, social security number, and address to validate the request and return an individual's account information. Each of these input data elements are returned within the response, providing an added layer of validation beyond the request ID found on both the request and any FI responses.

3. Describe the security implementation of the proposed solution, to include user access authentication methodology.

Depending on the integration method, PCG employs various authentication solutions, including:

- **Application Programming Interface** - System-to-system data exchange in real-time will utilize SOAP or RESTful API modules where PCG will configure an API to `handshake' with PCG's Service. For this type of data exchange, PCG employs Web Services which utilize the HTTPS Internet transfer protocol to enforce encryption throughout the transmission. All access to the PCG API modules will begin with an authentication phase utilizing Oauth2 protocol. Multi-factor authentication, where two or more pieces of evidence are used to determine the requester, will also be employed.
- **Secure File Transfer Protocol (SFTP)** - Data that is exchanged to and from PCG and authorized PRMP connections may utilize SFTP servers which are configured with Secure Shell Protocol (SSH) to establish a secure connection. SSH utilizes public key encryption to provide strong user authentication and secure encrypted

communications (data in transit) over the Internet. PCG SFTP servers employ an advanced encryption standard (AES) referred to as AES 256 which utilizes SSL/TLS across the Internet.

- **AVS Web Portal** – PCG's AVS Portal uses multi-factor authentication to prevent unauthorized access. First, PCG allow-lists agency IP addresses for system access to ensure only approved IPs are able to view and access the system's login page. Second, PCG requires authorized users to login to the system using NIST-based username and password requirements. Third, PCG employs an additional multi-factor authentication upon initial login during each calendar month (configurable) requiring the individual to further verify their identity via their response to an automated email confirmation. Alternatively, PCG can integrate your preferred single sign on (SSO) solution to allow PRMP to manage access to PCG's AVS Portal.

The combination of these authentication methods will ensure only authorized users obtain access to PRMP's sensitive client and asset verification data.

4. Provide examples of previous engagements implementing bank account validation.

As the country's leading asset and eligibility verification system provider, PCG has successfully implemented bank account validations in states across the country, including:

- **Alaska** – PCG implemented our fully configurable, SaaS-based "Instant Eligibility Verification System & API Gateway" (IEVS), which uses 24 different state, federal, and commercial third-party data sources, combined with eligibility policy-based and fraud detection analytics, to instantly predict eligibility for 28 different public assistance programs. Implemented data sources included bank account, as well as property assets. PCG later worked with the State to implement AVS checks into their ex parte renewal process.

- **Arizona** – PCG integrated financial asset data into our stand-alone AVS Web Portal to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect State-specific policy and to flag potentially disqualifying applicant criteria. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files.
- **Colorado** – PCG integrated our asset verification data source into the State's eligibility system via nightly batch file transfers in concert with State and their Deloitte contractors.
- **Connecticut** – Initially, PCG integrated financial asset data into our stand-alone AVS Web Portal to allow agency workers to verify the resource-based eligibility of public assistance clients. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files. Later, PCG successfully integrated our financial and property data into their eligibility system via real-time web services calls. PCG later worked with the State to implement AVS checks into their ex parte renewal process.
- **Delaware** – PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow agency workers to verify the resource-based eligibility of public assistance clients.
- **District of Columbia** – PCG integrated financial asset data into our stand-alone AVS Web Portal to allow agency workers to verify the resource-based eligibility of public assistance clients.
- **Hawaii** – PCG integrated financial asset data into our stand-alone AVS Web Portal to allow agency workers to verify the resource-based eligibility of public assistance clients. PCG subsequently worked with the agency to integrate our AVS directly into their integrated eligibility system via real-time web services calls.
- **Illinois** – PCG integrated both asset and property data sources into our stand-alone AVS Web Portal to allow agency workers to verify the resource-based eligibility of public assistance clients. PCG later worked with the State to implement AVS checks into their ex parte renewal process.

- **Maine** – PCG integrated both asset and property data sources into our stand-alone AVS Web Portal to allow agency workers to verify the resource-based eligibility of public assistance clients.
- **Maryland** – PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. Subsequently, PCG later integrated both of these data sources directly into the State's eligibility system via nightly batch file exchanges (at application) and monthly file exchanges (at renewal).
- **Massachusetts** – PCG integrated financial asset data into our stand-alone AVS Web Portal to allow agency workers to verify the resource-based eligibility of public assistance clients. PCG also worked with the agency to develop and implement the transmission of nightly and monthly batch request files.
- **Minnesota –** PCG integrated financial asset data into our stand-alone AVS Web Portal to allow agency workers to verify the resource-based eligibility of public assistance clients. PCG later worked with the State to implement AVS checks into their ex parte renewal process.
- **Nebraska –** Initially, PCG integrated financial asset data into our stand-alone AVS Web Portal to allow agency workers to verify the resource-based eligibility of public assistance clients. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files. Later, PCG successfully integrated our financial and property data into their eligibility system via nightly batch file transfers. PCG later worked with the State to implement AVS checks into their ex parte renewal process.
- **Nevada –** PCG implemented a financial institution asset verification data service into our fully configurable "Instant Eligibility Verification System & API Gateway" (IEVS).
- **New York State and New York City** – PCG successfully integrated financial asset and property data used to support the resource-based eligibility determinations of Medicaid LTC applicants and clients. PCG designed and deployed a customized user interface and eligibility rules engine to identify resources exceeding program limits, flag potentially disqualifying asset transfers, and alert workers to suspicious

or actionable “case clues” potentially affecting resource-based eligibility. PCG also worked with the Agency to develop and implement the transmission of nightly and monthly batch request files. Finally, PCG is currently working with the State to implement AVS into their ex parte renewal processes.

- **Oklahoma** – PCG integrated financial asset data into our stand-alone AVS Web interface to allow agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect state-specific policy and to flag potentially disqualifying applicant criteria. PCG also worked with the agency to develop and implement the transmission of nightly and monthly batch request files, including in support of Medicaid redeterminations.
- **Oregon** – PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. Subsequently, PCG later integrated both of these data sources directly into the State’s eligibility system via nightly batch file exchanges (at application) and monthly file exchanges (at renewal).
- **Rhode Island** – PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. Subsequently, PCG later integrated both of these data sources directly into the State’s eligibility system via nightly batch file exchanges (at application) and monthly file exchanges (at renewal).
- **South Dakota** – PCG integrated both asset and property data sources into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. Subsequently, PCG later integrated both of these data sources directly into the State’s eligibility system via nightly batch file exchanges (at application) and monthly file exchanges (at renewal).
- **Tennessee** – PCG integrated our asset verification data source into the State’s eligibility system via API in concert with State and Deloitte technical team members.
- **Texas** – PCG integrated Accuity asset data into PCG’s data broker service on the State’s behalf. This service connects the state’s eligibility system to a multiplexer API, which allows them to submit a single request to access data from 41 different

federal, state, and commercial data sources (including asset data) through a single PCG interface.

- **Utah** – PCG integrated our asset verification data source into the State's eligibility system in concert with State and Deloitte technical team members.
- **Vermont** – PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect state-specific policy and to flag potentially disqualifying applicant criteria.
- **Washington** - PCG integrated financial asset data into our stand-alone AVS Web interface to allow Agency workers to verify the resource-based eligibility of public assistance clients. PCG configured our rules engine to reflect state-specific policy and to flag potentially disqualifying applicant criteria.
- **Wisconsin** – PCG integrated our asset verification data source into the State's eligibility system in concert with State and Deloitte technical team members.

This sample of PCG AVS implementations supports PCG's assertion that we are North America's most trusted AVS provider.

4.2 Security

1. Describe how the proposed solution will implement security to protect sensitive HIPPA and privacy data.

2. The vendor must comply with CMS security regulations, for example MARS-E, ARC-AMPE, etc.

PCG recognizes that having a robust security program is critical in minimizing the impact of threats inherent in today's workplace and computing environments. We are committed to maintaining a healthy process of periodic audit and review of our program to assure that we are accomplishing our, and our clients', goals and objectives in protecting sensitive data and to assure that we evolve and adapt to address an ever-changing environment and threat landscape over time.

PCG's AVS is MARS-E 2.0–compliant and the firm and our applications are governed by annual SOC2 Type II audits and corporate information security controls based on NIST 800-53 v.5 standards. PCG manages sensitive Personally Identifiable Information (PII) and/or Protected Health Information (PHI) across more than 1,000 active agency projects. For over 35 years, we have succeeded in ensuring the security of our clients' sensitive data. PCG takes necessary steps to:

- Ensure appropriate protections and controls are developed and followed.
- Apply appropriate standards such as those outlined in NIST 800-53, MARS 2.0, ISO 27001, FedRamp, etc.
- Comply with pertinent regulations (e.g., HIPAA, FERPA, FIPS 140-2, FISMA, MARS-E, etc.) governing the access to protected data.

PCG is evaluated at least annually by a third-party audit firm in good standing to validate the effectiveness of our security and compliance posture and all solutions in place. These evaluations compare PCG's security and compliance policies and standards to its

operational effectiveness to validate that documented actions are being performed as required. Additionally, the evaluations determine whether PCG is aligned with various assessment frameworks, such as SOC1 and SOC2. On an annual basis, PCG receives a SOC2 Type II attestation from a certified auditing firm in good standing, Alexander Aronson Finning CPAs (AAFCPAs). PCG maintains records of these attestations on file for review.

All user activity is logged and tracked via native AWS tools, as well, and PCG maintains security policies that restrict staff access to production environments and sensitive data. PCG uses a web application firewall (WAF) to control network traffic and encrypts data both in transit and at rest. Data is encrypted before being uploaded to S3 storage and is further protected by S3 server-side encryption. PCG also employs automated application security testing (DAST and SAST) throughout any engagement.

All requests to PCG's load balancer go through our firewall and any unauthenticated requests are blocked here. PCG's load balancer listens only to HTTPS (443) connections and routes requests to our web server. PCG's lambda functions access our database internally inside our private subnet. PCG's memcached server is in a private subnet and only listens to our web server. PCG's database (primary and secondary) are in a private subnet and data is encrypted via AES 256.

PCG confirms that we have implemented security controls in accordance with all Federal and State policy and regulations, and we agree to comply with all PRMP information security policies and procedures. Protecting and controlling access to sensitive data, including encryption of PHI and PII, while at rest and in transit is achieved through a combination of infrastructure and system components, including:

- **AWS Hosting Architecture** – PCG's AVS is hosted in a custom-configured AWS Virtual Private Cloud (VPC), deemed FedRAMP moderate, which is essentially a private virtual network. This allows our PCG Systems Operations (Sys Ops) group to configure controlled inbound and outbound access from public and private

subnets. Any VPN connections from the VPC to other PCG or client networks are going to be encrypted. AWS allows PCG to log, monitor, and retain storage API call activities for auditing, copies data across a minimum of three AWS facilities, supports three forms of encryption, and adheres to security standards. Additionally, the AWS CloudTrail product logs, continuously monitors, and retains all account activity and actions across PCG's cloud-based data warehouse. CloudTrail maintains event history of all actions taken and analyzes these actions to support troubleshooting, compliance assurance, and operational auditing.

- **Identity and Access Management (IAM)** in AWS provides PCG with the ability to define roles for sharing access and restricting privileged access to processes and relational data instances. Web Application Firewall (WAF) allows PCG to block or allow network traffic to the application and define custom rules (SQL injection, customized application, etc.).
- **Application Programming Interface** – System-to-system data exchange in real-time will utilize SOAP or RESTful API modules where PCG will configure an API to 'handshake' with PCG's Service. For this type of data exchange, PCG employs Web Services which utilize the HTTPS Internet transfer protocol to enforce encryption throughout the transmission. All access to the PCG API modules will begin with an authentication phase utilizing Oauth2 protocol. Multi-factor authentication, where two or more pieces of evidence are used to determine the requester, will also be employed.
- **Secure File Transfer Protocol (SFTP)** – Data that is exchanged to and from PCG and authorized PRMP connections may utilize SFTP servers which are configured with Secure Shell Protocol (SSH) to establish a secure connection. SSH utilizes public key encryption to provide strong user authentication and secure encrypted communications (data in transit) over the Internet. PCG SFTP servers employ an advanced encryption standard (AES) referred to as AES 256 which utilizes SSL/TLS across the Internet.
- **File Storage / S3 Buckets / Glacier Storage** – The file repositories for where files, images, spreadsheets, and other file artifacts will reside in the AWS MS VPC provides several ways of securing at rest data. Among those are KMS – managed

encryption keys, an S3 Encryption Client – a client encryption library to encrypt data before it is uploaded to an S3 storage location, and S3 server-side encryption (SSE) keys.

- **MySQL Database** – PCG utilizes AWS Aurora RDS (MySQL). The database store data in encrypted format, at rest. Data, to and from, the applications (API, batch, etc.) is encrypted with TLS1.2, while in transit. PCG considers all individually identifiable health information as it relates to HIPAA covered entities to be sensitive and to warrant encryption in database (while at rest) and in transit.

Confidential data in PCG's custody is encrypted while it is at rest, including data stored on workstations and desktops, removable media, and backups. It is also encrypted when in motion over untrusted networks, including data traveling via internet or non-PCG managed/unprotected networks. PCG employs encryption in its e-mail system to ensure outbound e-mails containing confidential information are appropriately secured.

PCG's contracted data providers are held to the same information security standards and each is subject to an annual SOC2 Type II attestation from a certified auditing firm in good standing. Results of these assessments will be provided to PRMP, upon request. Additionally, all data exchanges between Accuity and financial institutions will comply with all federal, state, and local financial and consumer information and privacy requirements.

3. Must support PRMP Security Assessment Requests. It may include Penetration Tests and also make available any system documentation required in support of any security assessment.

PCG regularly engages third parties and their tools to perform independent penetration tests and we agree to provide the results to the agency, upon request. Additionally, PCG agrees to undergo any required PRMP security assessments, and we agree to make available system documentation required to support these assessments.

4.3 Identifying Information

1. Describe the proposed methodology to request information concerning both open and closed accounts including balances and date of closure on accounts closed with the five-year (sixty-month) lookback period.

PCG has been engaged by more state agencies to provide Medicaid AVS than all other vendors combined. We intend to leverage this experience to provide the Puerto Rico with a proven AVS available via the country's most-used AVS web interface, via the country's most-used AVS API, and/or via the country's most-used periodic batch file exchange.

PCG has successfully deployed AVS on behalf of more agencies than all other vendors combined.

On the following pages, PCG has summarized our AVS request and response process. Because every agency is in a different state of readiness to interact with a data service like AVS, PCG's AVS is designed to be easily accessed through multiple interface options. PCG understands that Puerto Rico is looking to access AVS via both a stand-alone web application and via a direct integration between your selected vendor and your eligibility system. PCG maintains nearly 1,000 percent more proven experience implementing AVS both ways than our closest competitor, as follows:

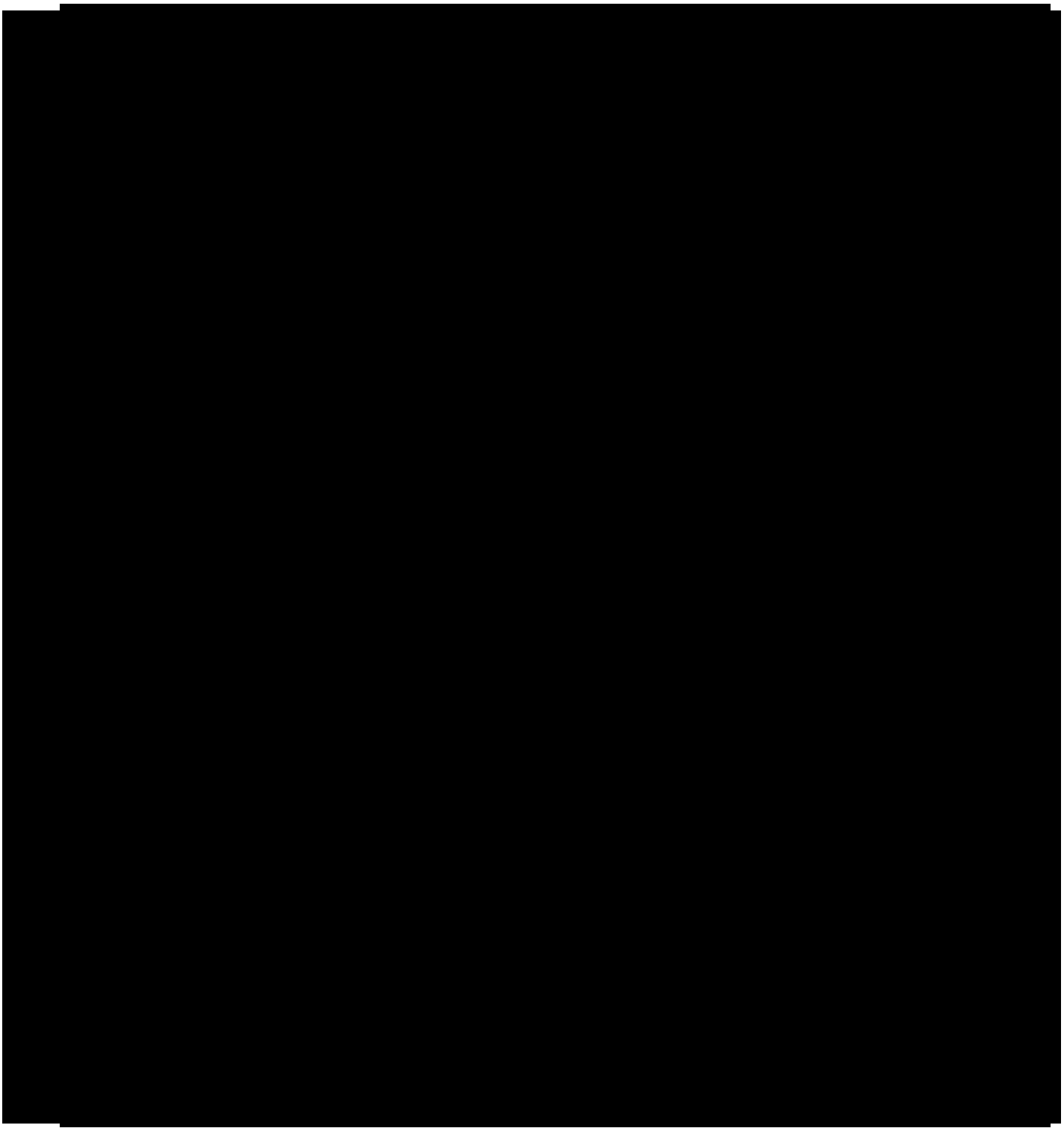
Integration Method	State
Partial Batch (i.e. requests only) + PCG's AVS or IEVS web applications	Alaska, Arizona, Massachusetts, Minnesota, Nebraska, Nevada, New York City, New York State, Oklahoma, Oregon, Rhode Island, Washington

Integration Method	State
Full Batch (i.e. requests and responses)	Colorado, Connecticut, Maryland, Nebraska, New Hampshire, New Jersey, North Carolina, Oregon, Rhode Island, South Dakota, Utah, Wisconsin
API	District of Columbia, Hawaii, Montana, Tennessee, Texas, Utah
Stand-alone AVS Portal Only	Delaware, District of Columbia, Hawaii, Illinois, Maine, Minnesota, Nevada, South Dakota, Vermont, Washington
Monthly Renewal and/or Ex Parte Batch Files	Alaska, Arizona, Colorado, Connecticut, Illinois, Maine, Maryland, Massachusetts, Minnesota, Nebraska, Nevada, New York City, New York State, Oklahoma, Oregon, Rhode Island, Texas, Utah, Vermont, Washington, Wisconsin

Figure 33.0: PCG maintains proven AVS experience integrating via batch, API, and as a stand-alone web application, ensuring you will be in good hands regardless of how you choose to implement AVS both initially and in the future.

PCG's AVS connects agencies with more than 90 percent of the FIs in the United States to verify account ownership potentially impacting resource-based benefits eligibility, in addition to employing the world's largest data providers – and Puerto Rico motor vehicle agencies – to perform a national and Puerto Rico-based search for property and motor vehicle assets. PCG's AVS is designed to help our agency partners achieve the following goals:

1. Eliminate the need for your workers to manually collect and review physical bank statements and real property records
2. Automatically identify undisclosed bank accounts



A. AVS Requests

There are three primary mechanisms by which PRMP can submit requests for asset verification to PCG for processing. PCG's other AVS clients typically submit application

requests on the day of application and renewal requests 30 days prior to each client's renewal date.

1 **Batch Transfer**: PCG's AVS allows our clients to utilize a batch transfer to securely transfer files containing AVS requests to an SFTP server via either flat file or XML batch transfer on a real-time, nightly, weekly, monthly, and/or ad-hoc basis. PCG works with our clients to create business rules to allow you to select and batch all new, applicable applications and/or renewals for transmission. Request data can either be pulled by PCG from the agency's SFTP server, or the agency can deliver it to an SFTP server hosted by PCG.

2 **API**: Another primary mechanism for submitting AVS requests is via real-time web services calls. PCG hosts the AVS request service and will provide our agency clients with an industry-standard WSDL to allow you to create interfaces within your eligibility system to submit real-time requests and receive request acknowledgments and error messaging.

3 **AVS Web Portal**: The PCG AVS Web Portal is an independent web application that allows our clients to connect with our AVS service while minimizing – or altogether avoiding – the need for interface development activities within your eligibility system. PCG's AVS Web Portal allows authorized user roles to submit ad-hoc AVS requests from within the Portal by inputting basic demographic case information. Once submitted, ad-hoc requests are integrated into the AVS processing workflow as those AVS requests submitted via batch or API. PCG's AVS Web Portal also allows requests to be transmitted and populated via the Batch Transfer process described above, which will allow your workers to avoid manually inputting ad-hoc AVS requests into our Web Portal. PCG's AVS Web Portal is described in detail in ***Appendix 7*** of this RFP.

Regardless of whether Puerto Rico submits AVS requests via batch, web services, and/or within PCG's AVS Web Portal, all requests are ingested into PCG's AVS processor and will generate results to be delivered to the agency via their preferred method.

B. AVS Processing

PCG, through our data provider Accuity, already maintains and operates an AVS FI network that includes more than 90 percent of the FIs in the United States, as well as nearly 700 Puerto Rico-based FIs. Accuity's FI network allows for the only AVS data source which can provide financial account information from not just the nation's largest FIs, but also from the regional and local FIs your clients are most likely to bank with. Any other data provider will only afford Puerto Rico with access to large, multi-national FIs. Only Accuity's AVS data will give PRMP access to smaller and/or local financial institutions, including credit unions. As ***Appendix 1*** of this proposal, we have provided a list of our Puerto Rico-based Regional Financial Institution (FI) network.

PCG leverages this unparalleled FI network with automated processes to cast the widest possible net for discovering undisclosed assets while electronically verifying disclosed assets. Each AVS request received by PCG triggers the following asset search functions:

1 **National Account Search**: PCG processes all AVS requests through the Early Warning national database of accounts held at the nation's largest FIs to identify any account maintained by a consumer at any of the nation's largest FIs anywhere in the United States. These FIs represent approximately 50 percent of the depository accounts in the United States and allow PCG to quickly verify the existence of any applicant/beneficiary account at any of the FIs in the United States. One hundred percent of all PCG AVS cases are processed through this national network of FIs to ensure PCG's coverage is as comprehensive as possible.

2 **Local Account Search**: At the same time, PCG also utilizes a geographic search application to identify local and regional FIs most likely to maintain an applicant and/or beneficiary account based on logic such as geographic proximity to the applicant or beneficiary address. PCG utilizes Accuity's Geographic Undisclosed Account Radial Detection component, or GUARD, as the mechanism that determines logic by which asset verification requests are to be distributed to local and regional FIs. GUARD utilizes

various FI databases and proprietary logic to optimize the probability of identifying FIs specific to a search for financial assets owned by an individual benefits applicant/beneficiary.

The GUARD application provides a means to identify the FI most likely holding assets for applicants and beneficiaries, which are outside of the nation's largest FIs. In part, by focusing on FIs with branches closest to the customer, the GUARD application provides a reasonable approximation of the likelihood that a customer would have undisclosed accounts with a particular FI.

The operational efficiency of GUARD searches involves several factors. The following data elements are the criteria that most affect GUARD's selection of FIs:

Element	Description	GUARD Selection
Distance	Physical distance from the customer's address to the FI's location.	Smaller values are ranked higher
Presence	The number of branches the FI has in the same zip code as the customer. Calculated from Accuity's information for each zip code.	Smaller values are ranked lower
Branches	The FI's number of Branches across the U.S. Indicator of the national size of the FI.	Smaller values are ranked lower
Direct Deposits	The FI's number of SSI Direct Deposit Accounts as an indicator of national ABD population of accounts.	Smaller values are ranked lower

Figure 34.0: Factors Involved in GUARD Searches. The GUARD algorithm has been developed and refined in concert with the Social Security Administration since 2008 in support of their Supplemental Security Income (SSI) AVS program.

3 **Directed Account Search**: In addition to our national and local account searches, PCG's AVS will allow your authorized users to request account lookups at any

specific FIs anywhere in the United States, including at any participating Puerto Rico-based FIs. Combined with our national and local search, this functionality ensures that PCG's AVS clients can verify 100 percent of known accounts maintained by your clients while also identifying previously undisclosed assets potentially impacting eligibility.

The combination of PCG's national, local, and directed asset searches will ensure that the State of Puerto Rico is able to cast the widest possible net in the search for financial assets potentially impacting eligibility.

LexisNexis' data assets are comprised of more than 98% of the deeds, mortgages, and assessments in the U.S., and thousands of Puerto Rico-based address data sources

4 **Property Search**: As we have for the past tn years, PCG is proposing to also include property data within our AVS. PCG uses

LexisNexis' vast property data assets, which are comprised of more than 98 percent of the deed, mortgage, and assessment data from across the United States. In addition to receiving property records from Puerto Rico, LexisNexis also updates and maintains historical property data for 51 states and territories. This access provides us with the ability to identify property that is owned outside of Puerto Rico and its neighboring states, thus creating a more comprehensive picture of the applicant.

PCG is the country's most experienced property verification vendor, as evidenced by large-scale property verification engagements in Texas, New York, Oregon, Maryland, Maine, South Dakota, Illinois, Delaware, and more. On each of these engagements, PCG has worked with LexisNexis property data to provide our HHS agency clients with the most comprehensive search for property available in North America today. This experience, combined with PCG's already fully integrated batch and web service connectivity with LexisNexis, will ensure the seamless access to this data in Puerto Rico.

PCG's U.S.-based property search includes multiple processes that take place concurrently to identify all of the property assets maintained by applicants and beneficiaries:

Search	Description
Deed Search	PCG processes all AVS requests through the LexisNexis deed database containing millions of records updated on a bi-weekly basis and every time a property is purchased or sold.
Mortgage Search	PCG processes all AVS requests through the vast LexisNexis mortgage database containing millions of records updated on a bi-weekly basis and every time a property is purchased or sold.
Assessment Search	PCG processes all AVS requests through the LexisNexis assessment database containing millions of records

[redacted] updated on an annual basis or every time an assessment is completed.

Figure 36.0: PCG's Property Search Processes. The combination of deed, mortgage, and assessment searches, and LexisNexis' ability to link disparate and incomplete records to applicants' identities, ensures the most comprehensive net for detecting property assets maintained by Puerto Rico's applicants and beneficiaries.

PCG will identify any property and real estate owned, or previously owned, by the applicant/beneficiary anywhere in the United States, including in Puerto Rico, within the previous 60 months.

5 **Motor Vehicle Search and Value Assignment**: PCG understands that owning a second motor vehicle, absent a legitimate medical need for doing so, can potentially impact the resource-based eligibility of your clients. For this reason, we are proposing to provide PRMP with access to motor vehicle data. PCG's AVS incorporates TransUnion's motor vehicle records to identify any currently and previously owned vehicles. [redacted]

PCG will supplement TransUnion's motor vehicle data by establishing interfaces with Puerto Rico's Department of Transportation and Public Works, Office of the Commissioner of Navigation, and Bureau of Transportation and other Public Services, and will use this data to further detect motor vehicle assets owned by your clients.

[redacted]

[redacted]

Additionally, PCG also agrees to integrate watercraft and aircraft ownership data into our AVS, upon request from the State.

[redacted]

analytics. PCG can return these responses via SFTP and/or include these PDF reports within our AVS Web Portal for worker download.

PCG's AVS responses will include all asset information provided by financial institutions, and any automated analytics PRMP instructs PCG to include, if any. Whether the account was previously known to PRMP or was undisclosed, PCG will return, at minimum, the following financial asset data elements when assets are discovered:

Data Element	Description
Financial Assets	
Account Owner(s)	For each account discovered, PCG will identify each account owner associated with the account.
Financial Institution	For each account discovered, PCG will identify the financial institution where the account is maintained.
Financial Institution Branch Address	For each account discovered, PCG will identify the financial institution branch address where the account is maintained.
Account Number	For each account discovered, PCG will identify the account number.
First Minute-of-Month Account Balances	For each account discovered, PCG will identify the account balance as of the first minute of the month for each month of the look-back period of up to 60 months.
Account Type	When provided by the FI, PCG will also include the type of account.
Account Open/Close Date(s)	When provided by the FI, PCG will also include the account's open and/or close date.

Figure 41.0: Key financial asset data elements to be returned by PCG's AVS.

Key property data elements to be returned by PCG's AVS include:

Data Element	Description
Owned Property Address(es)	Address(es) of currently owned properties.
Owned Property Owner(s)	Owner name(s) of currently owned properties.
Owned Property Assessed Value(s)	Current assessed value of the land plus improvements, before exemptions.
Owned Property Market Value(s)	Current market value of the land plus improvements, before exemptions.
Owned Property Tax Year(s)	Tax assessment year(s).
Owned Property Purchase Date(s)	Date currently owned properties were purchased.
Owned Property Purchase Price(s)	Purchase price of currently owned properties.
Currently Owned Flag	Flag indicating that consumer currently owns property at address indicated.
Sold Property Address(es)	Address(es) of any properties sold within previous 60 months.
Sold Property Sale Date(s)	Date of sale of any properties sold within previous 60 months.
Sold Property Sale Amount(s)	Sale price of any properties sold within previous 60 months.
Sold Property Owner(s)	Name of purchaser(s) of any properties sold within previous 60 months.
Sold Property Deed Type(s)	Type of deed associated with sale of any properties sold within previous 60 months.

Figure 42.0: Key property data elements returned by PCG's AVS.

Finally, PCG's AVS will return, at minimum, the following key motor vehicle data elements:

- Currently Owned Vehicles (i.e., Year, Make, Series, Model, VIN, Body Style, Vehicle Type, Weight, Length, Height, Most Current Tag #, Tag Valid to and from Dates, Doors, MSRP, Plant, Restraint Type, Drive Type, Fuel, Engine, Transmission, and Current Value)
- Title Holders (i.e., Name, Address, Date of Birth, Title Number, State Titled In, Original Title Date, and Title Transfer Date)
- Lien Holders; Lessors
- Registrant (i.e., Name, Registration Date, Date of Birth, and Address)
- Vehicle Tag History (i.e., License Plate and License Plate Valid from and to Dates)
- Vehicle First Seen Date
- Vehicle Last Seen Date

As with PCG's options for submitting AVS requests, PCG also offers the same response mechanisms; API, batch, and PCG's stand-alone AVS web application.

All AVS responses will include Account Found, No Account Found, or No Response indicators. Each request will include a unique request ID which will be returned in the response to allow PRMP to map requests to responses. For any accounts found, PCG will return up to 60 months of first minute-of-the-month account balances, as well as the name(s) of the account owner(s), account number, account type, account branch address, and the open/close dates, if provided by the FI.

2. Describe the proposed methodology to determine if the identifying information appears or appeared on any account as single or joint owner during the five-year (sixty month) lookback period.

All PCG AVS requests result in the return of up to 60 months' worth of account balances, as well as the names of any account holders, including joint account owners, ensuring

PRMP will be able to attribute the correct value of owned assets to all account owners during the entirety of the look-back period.

3. Describe the proposed methodology to match individuals to accounts.

FIs participating in PCG's AVS network required PCG to submit a client's name, address, date of birth, and social security number to return account information. FIs use these demographic data elements to automatically match the input identity to any owned or co-owned accounts.

4. Describe the proposed methodology to include at a minimum checking, savings, investment accounts, individual retirement accounts, treasury notes, certificates of deposit, annuities and any other assets that may be held or managed by a FI.

The PCG Team's Financial Institution Network is trained to provide account balance information for both open and closed accounts for up to 5 years, including for the following account types: annuities; CDs; checking; savings; custodial; trusts; burial funds; IRAs; money market; social security; keoughs; rent securities; Christmas clubs, and other depository account types.

5. Describe the proposed method to allow for verification requests to be sent to FIs other than those identified by the applicant or recipient.

In addition to our national and local account searches, PCG's AVS will allow your authorized users to request account lookups at any specific participating FIs anywhere in Puerto Rico or the United States. Directed account searches can be prompted by either your eligibility system or the users themselves. Combined with our national and local search, this functionality ensures that PCG's AVS clients can electronically verify most

known accounts maintained by your clients while also identifying previously undisclosed assets potentially impacting eligibility.

6. Describe the proposed methodology to provide for matching of assets to include FIs located outside of Puerto Rico.

In addition to supporting verification requests to any specific FI, PCG's AVS also executes each of the following searches in response to any request, ensuring PRMP is always canvassing FIs located outside of Puerto Rico.

1. **National Account Search**: PCG processes all AVS requests through the Early Warning national database of accounts held at the nation's largest FIs to identify any account maintained by a consumer at any of the nation's largest FIs anywhere in the United States. These FIs represent more than 50 percent of the depository accounts in

the United States and allow PCG to quickly verify the existence of any applicant/beneficiary account at any of the FIs in the United States. One hundred percent of all PCG AVS cases are processed through this national network of FIs to ensure PCG's coverage is as comprehensive as possible.

As a no-cost enhancement, PCG is also expanding our national bank search to include up to 32 FIs, more than doubling the number that was previously available (national search previously included 13 FIs). These newly added FIs are regionally significant and will typically respond to asset verification requests within 24 hours. Additionally, because these FIs have been added to the national account search, if no accounts are found, they will not be included in the local FI search portion of the detection process, thus allowing the local geographic search to focus on FIs with a higher probability of holding account information for the benefits applicant.

2 **Local Account Search**: At the same time, PCG also utilizes a geographic search application to identify local and regional FIs most likely to maintain a client account based on logic such as geographic proximity to the client's address. PCG utilizes Accuity's Geographic Undisclosed Account Radial Detection solution, or GUARD, as the mechanism that determines logic by which asset verification requests are to be distributed to local and regional FIs. GUARD utilizes various FI databases and proprietary logic to optimize the probability of identifying financial institutions specific to a search for financial assets owned by an individual benefits applicant/beneficiary, primarily by looking at the geographic location of the FI compared to the address of the client.

7. Describe the maximum timeframe for matching of assets to include FIs located outside of Puerto Rico for the proposed solution.

Nationally, 90 percent of PCG's responses are received within one day, 95 percent are received within five days, and 98 percent are received within ten days. However, given that Puerto Rico-based FIs are new to participating in our AVS network, we may realize

slower response times initially. That said, as these Puerto Rico-based FIs are trained and transitioned away from slower response mechanisms to more automated response mechanisms (e.g., API), response rates will improve considerably.

4.4 Network, Methodology and Reporting

1. Describe the established network of FI who will participate in the AVS.

PCG's AVS FI network includes more than 90 percent of the financial institutions in the United States, as well as 671 participating Puerto Rico-based bank branches representing 183 of Puerto Rico's 188 financial institutions, including the following FIs, each of whom maintain at least five branches in Puerto Rico:

- Banco Popular de Puerto Rico
- FirstBank Puerto Rico
- Oriental Bank
- Cooperativa de Ahorro y Credito de Arecibo (COOPACA)
- Baxter Credit Union
- Cooperativa de Ahorro y Credito Las Piedras
- Cooperativa de Ahorro y Credito Vega Alta (VEGA-COOP)
- Cooperativa de Ahorro y Credito Roosevelt Roads
- Puerto Rico FCU
- Cooperativa de Ahorro y Credito de la Asociacion de Maestros de Puerto Rico (EDU-COOP)
- VAPR Federal Credit Union
- Cooperativa de Ahorro y Credito Oriental
- Cooperativa de Ahorro y Credito La Puertorriquena
- Cooperativa de Ahorro y Credito de Manati Inc
- Cooperativa de Ahorro y Credito Maunabo (MAUNA-COOP)
- Cooperativa de Ahorro y Credito la Sagrada Familia
- Cooperativa de Ahorro y Credito Naguabena
- Cooperativa de Ahorro y Credito de Barranquitas (CREDICENTRO-COOP)

In total, PCG's FI network includes the following unique financial institutions:

Location	Total FIs	FIs in PCG's AVS Network	% Coverage
Within Puerto Rico	188	183	97.3%
National Total as of 10/22/2024	9,642	9,703	99.1%

Figure 45.0: PCG's AVS FI network includes 97% of Puerto Rico's FIs and 99% of FIs on the mainland.

In total, PCG's FI network includes the following total financial institution bank branches:

Location	Total FIs	FIs in PCG's AVS Network	% Coverage
Within Puerto Rico	671	678	98.9%
North America	97,121	98,689	98.4%

Figure 46.0: PCG's AVS FI network includes 99% of Puerto Rico's bank branches and 98% of bank branches on the mainland.

PCG has included a complete list of participating Puerto Rico-based FIs as ***Appendix 2*** of this proposal.

2. Describe the current arrangements or plan for arrangements with the FIs.

Accuity will achieve maximum FI participation on behalf of PRMP in the border states around Puerto Rico and throughout the United States through all segments of the depository FI Community. Accuity's FI Network Management Plan is based on LexisNexis Risk Solutions' long-standing relationships with the banking industry as the Registrar of the American Bankers Association routing numbers, where they have established reporting relationships with every financial institution in the United States. This will ensure Accuity can engage each FI in the United States on participating in their AVS network, as follows:

1. **FI Notice Phase**: All financial institutions already participating in the Accuity AVS FI Network will be contacted and informed that Puerto Rico is going live with an asset verification service. This won't come as a surprise to these FIs, as they each previously agreed to participate knowing that additional states and territories would be added over time. As a result, the expectation is that all currently participating FIs nationally will continue to participate on Puerto Rico's behalf.

   Accuity staff will inform these FIs that they will begin to process asset verification requests for Puerto Rico's Department of Health on a specific date. For those FIs using manual methods to respond to requests (e.g., fax or mail), Accuity staff will encourage them to transition to faster, more automated methods requiring fewer manual activities, including API or batch.

2. **FI Training Phase**: Every newly participating FI will be trained on the correct procedures for responding to AVS requests for account balance information. User manuals and user credentials (user ID and temporary password) are distributed to these FIs in preparation for the launch of their active participation, ensuring they can respond to requests via Accuity's web application on day one. For those financial institutions already participating in the AVS network, they are advised that re-training opportunities are available, upon request.

3. **FI Operations Phase**: Prior to go live, the FIs information is loaded into Accuity's production environment, enabling ongoing access to the asset verification service. This information is updated on an ongoing basis to assist Accuity and the FI in the timely and accurate fulfillment of AVS requests going forward.

   Accuity National Financial Institution Database is a comprehensive database of financial institutions that facilitates direct and timely contact with the correct FI personnel and technical resources. Using this database on an ongoing basis allows Accuity to maintain the service with all participating North American FIs

while supporting FIs in responding to AVS requests on a timely and consistent basis.

There are five methods FIs employ to participate in Accuity's AVS network, which include:

- **Batch Processing**: Facilitates system-to-system data transmission, eliminating manual intervention and activities.
- **Web Service**: Automated, real-time, system-to-system data exchanges.
- **Secure Internet**: FIs can view and fulfill requests from Accuity's web application, either manually or by uploading response files directly to the application.
- **Automated Fax**: In certain cases, Accuity will register FI's fax information to allow them to automatically fax requests to the FI's designated contact. The FI faxes the response back to a dedicated, secure fax at Accuity where the response information is data entered into Accuity's system by trained specialists.
- **Mail***:* Certain smaller and/or rural FIs are incapable of participating electronically. In these cases, Accuity will register the FI's mailing address information to allow them to automatically print requests to be mailed to the designated FI contact. FIs return responses via mail to a dedicated Accuity address, where they are data entered into Accuity's system by trained specialists.

4. **FI Performance Monitoring Phase**: The PCG Team will automatically follow-up with any FIs who have not responded to an AVS request within 10 days, and we will periodically follow-up with any FIs exhibiting regular response delays to transition them into faster, more automated responses mechanisms (e.g., API or batch).

Additionally, the PCG Team will engage FIs on any occasion, albeit rarely, when the data reported through AVS doesn't match what a client is presenting via a physical bank statement or similar. To track this, PCG also maintains a "Discrepancy Log" on behalf of each of our AVS clients. PCG shares this log with both the agency and Accuity and provides the agency with weekly status updates on any outstanding discrepancies. We will do the same on PRMP's behalf, as well.

The combination of these tested and proven procedures, which have been executed in every state in the country, will ensure the successful onboarding and operation of any currently and newly participating financial institution.

3. Describe the proposed methodology to establish a system for recruiting FIs.

PCG's financial asset data provider, Accuity, maintains an established program designed to recruit FIs into joining their AVS network and/or continuing to participate in their network. Accuity has a 15-year history of working with FIs in the asset verification marketplace. Our FI recruitment approach includes the following objectives:

- Build on the established and committed base of FIs currently participating in FI network both in the United States and in Puerto Rico.
- Communicate with FIs, as follows:
  1. Once again inform FIs that Accuity will continue to provide asset verification services for PRMP.
  2. Review procedures and options for accessing the PRMP-specific asset verification requests.
  3. Confirm the current information stored in Accuity's Financial Institution Database and make necessary revisions.
  4. Encourage each FI to register for Accuity's automated web service in order to expedite response times.

5. Provide ongoing FI education and support.

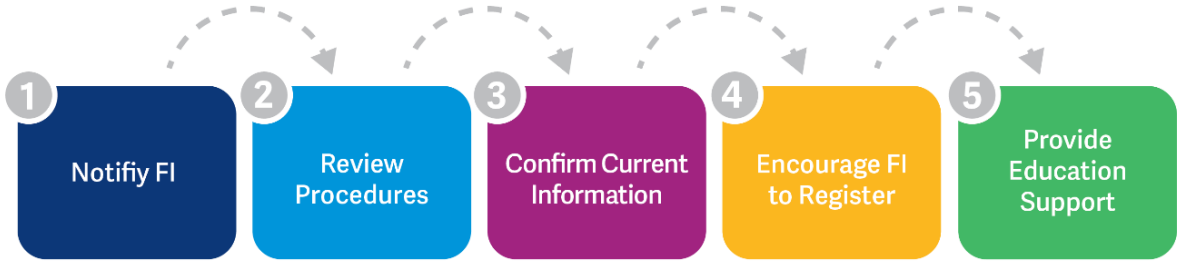


Figure 47.0: The PCG Team's Recruitment Overview. Our process will build on the established and committed base of FIs currently participating in Accuity's AVS FI Network in Puerto Rico.

4. Describe the proposed methodology to maintain FIs in the network.

The PCG Team constantly works with FIs to, first, recruit them into participating and, second, recruit them from manual response methods such as mail or fax to faster, more automated response methods like API, batch, or web-based submissions.

Specifically, both during the implementation and after going live, the PCG-Accuity team will continue to work with all of the FIs in to ensure successful participation in your AVS program, as follows:

- Continue to maintain a centralized processing workflow for all branch and subsidiary locations associated with the FIs or processing centers.
- Continue to maintain relationships with FI decision-makers and primary/secondary contacts to expeditiously solve problems during ongoing operations.
- Continue to encourage FI conversion to more expeditious response methods, including web, batch, and API-based response mechanisms.
- Continue the use of automated outreach in the event of an overdue request and/or a pattern of late responses. PCG agrees that any outstanding requests that have

not been fulfilled within ten business days will result in us initiating contact with the financial institution in question to solicit an expedited response.

- Continue to review FI procedures for accessing asset verification requests and for submitting asset verification responses, as needed.
- Continue to encourage FI participation via the head office or processing center, rather than via individual branches.

PCG will also continue to communicate with the FI community during the implementation phase of this engagement in an attempt to recruit the remaining manual FIs (i.e., responding via mail or fax) to more expedited and/or automated response processing.

Further, PCG will provide a monthly financial institution participation file listing all participating FIs—including the name, address, and Financial Institution ID of each. PCG will submit this file to PRMP by the 20th calendar day of each month and will include contact information with this submission in the event PRMP has any questions or concerns.

5. Describe the proposed methodology to make FI verifications available for inspection, and how to modify a request that has already been submitted for corrections, such as SSN.

6. Describe any AVS reporting capabilities available to the state.

PCG's seasoned project managers understand the importance of ensuring our agency clients have the tools needed to easily track and monitor asset verification activities, users, and results throughout any engagement. PCG accomplishes this via each of the following tools, as described in the next section:

- Weekly Implementation Reports
- Monthly Performance Reports
- Ad hoc reports, as requested
- AVS Reporting Dashboard
- Communications Management Plan

Weekly Implementation Report. PCG's Project Manager and Associate Project Manager will lead weekly (at least) project status meetings during the implementation phase of this engagement and will be responsible for mapping PCG's actual activities and progress to our planned activities as defined in our work breakdown structure (WBS), reporting on the status of all implementation activities, highlighting any known or new potential risk and the corresponding mitigation strategies for addressing the risk, and reporting on planned next steps and sprint activities.

All of these topics will be formally memorialized via our Weekly Implementation Report, which we will deliver to PRMP by close of business on the Monday following each week. This report will include each of the following sections and topics:

Weekly Implementation Report	
Current Project Activities	This section will highlight all user stories which were initiated, worked on, and/or completed during the prior week.
Defects	This section will detail any new or outstanding defects, as well as their current statuses, assignees, and anticipated resolution dates.
Agency Interactions	This section will summarize all agency meetings and/or calls which took place the prior week, including a summary of the agenda and any notable outcomes and/or decisions.
Project Risk	This section will detail any know or potential risks, including a description of the risk, mitigation steps, and a contingency plan.
Project Issues	This section will detail any project issues, including a description of the issue, the root cause, and planned corrective actions.
Next Steps	This section will detail all activities and user stories which are expected to be addressed during the upcoming week.

Figure 49.0: Weekly Implementation Report.

PCG will customize this report further to capture any other PRMP needs, upon request.

Monthly Performance Report. We will not only submit weekly implementation reports, but we will also submit a Monthly Performance Report to the State by the 10th day of the following month. PCG's monthly report will include the following report criteria, at minimum, and PCG agrees to supplement this report with any additional details PRMP requests.

Monthly Performance Report	
Transaction Report	This section will detail the number of transactions by data source, number of responses, and response timing of each response by data source.
Financial Institution Response Rate Report	This section will include an analysis of financial institution responses, including the number of requests, number of responses, average response time associated with each financial institution, accounts found, undisclosed accounts found, results from any analytics being employed, and more.
Usage Report	This section will detail usage of PCG's asset verification service, including by region, county, user, and program.
Project Management Report	This report will map the status of all PCG activities to milestones and completion dates from our project management plan to allow PRMP to monitor our progress each month (this information will also be available in real-time through the project SharePoint site).
Corrective Action Report	This section will detail any outstanding inquiries more than 25 days old and the corrective actions take to address this with FIs.
Risk Report	This section will catalogue all identified risks, mitigation strategies and activities, contingency plans, and the current status of each.
Performance Report	This section will detail any system outages and/or incidents, including when and how it was discovered, the time until it was reported to Tennessee, any system and operational impacts, and corrective measures to detect and prevent future outages and incidents.

Monthly Performance Report	
Issues Log	This report will detail all help and support activities, including the length of time from reporting to resolution, the status of all outstanding resolutions, and metrics on availability, response times, call and e-mail volumes, and more.
Discrepancy Log	This report will detail all pending discrepancies where PRMP identified AVS results which contradict physical statements.
Transaction Detail	This report will include all transaction details, including the request and response information associated with each request ID.
Performance Standard Compliance	This report will measure PCG's compliance with PRMP's performance standards, both over the life of the project and during the prior month.
Aging Summary	This report will summarize the status of all outstanding inquiries, including the number of days outstanding.

Figure 50.0: PCG's Monthly Performance Report is designed to give PRMP all of the information you need to evaluate PCG and report out on metrics that are important to the agency.

Ad-Hoc Reporting. PCG also agrees to provide weekly or bi-weekly status reports, including any requested metrics and/or information, upon request. Finally, PCG also agrees to create and submit any ad-hoc reports and/or additional reports—including any urgently needed reports—requested by PRMP for the duration of this engagement. PCG will generate reports upon request and will provide these reports in the format of your choosing. PCG can modify our approach to reporting to include any additional data elements we maintain within our asset verification data warehouse to suit PRMP's needs.

The combination of PCG's regularly scheduled reporting with the ad hoc reporting capabilities available within our AVS Portal will ensure PRMP is fully informed throughout this engagement.

7. Describe the proposed methodology to make available FI verifications to the state after completion of contract.

PCG understands that it is critical that Puerto Rico can smoothly transition from one AVS vendor to another should it be necessary. PCG is committed to adequately documenting all processes, as well as all business, functional, and technical requirements, to ensure the continuity of operations in the event of a change in vendor.

PCG will take necessary steps to:

- Document and maintain copies of all relevant data and reference tables, documentation, and other pertinent information necessary to take over and

successfully assume operational activities, including all works in progress, and to provide this to PRMP upon request.

- Provide current inventories, correspondence, documentation of outstanding issues, and other operations support documentation to PRMP upon request.
- Transfer all written and electronic documentation, including work in progress pertaining to the business processes including but not limited to: work instructions, work process flows, system user instructions, process memos, plans, and any other materials used in the business process.
- Transfer all project data, including all historical request and response information, to the agency in your preferred format.
- Create and maintain documentation describing all relevant information regarding the data sources used within the verification service.
- Transfer all training materials in electronic format including but not limited to the training plan, training curriculum, training materials, and any in-progress training content.
- Completely transfer all of the above to PRMP and/or another entity, upon request.

Turnover Artifacts

PCG is committed to compiling, maintaining, and transferring all documentation and artifacts necessary to inform an incumbent vendor and allow them to expeditiously establish high-quality integrated state verification system services. PCG will electronically store all project requirements, documentation, and artifacts within the forthcoming SharePoint site, to be maintained by PCG and accessible to PRMP at all times. As requirements change and/or evolve, PCG will update project artifacts stored within this site. This SharePoint and ongoing document revisioning will ensure ongoing, transparent agency access to project artifacts and will allow for appropriate version control, respectively.

Data Definition Artifacts

PCG will document and maintain the following artifacts and information for each data source being accessed by our verification service, unless prevented from doing so by

third-party commercial data vendors, and for each process being generated by our asset verification service.

- Process name
- Data source(s)
- Technical requirements
- Sample file(s)
- Transmission protocol(s)
- Data source contact information
- Testing contact information
- Development contact information
- Encryption type and corresponding keys
- Connectivity requirements
- Implementation user stories, test scripts, and acceptance criteria
- Number of files, if applicable
- Specifications, WSDLs, and/or schema
- File transmission frequency, if applicable
- Full or incremental transmission indicator, if applicable
- Producer and processer of file indicator, if applicable
- Historical data (including but not limited to case history and data source history)
- Work in progress data, documentation, and requirements.

Reports Definition Artifacts

PCG will document and maintain the following artifacts and information for each report being accessed and/or generated as part of this engagement:

- Sample report (including ad-hoc reports)
- Report generation requirements
- List of report data elements and mapping of report data elements with element data source(s)
- Implementation user stories, test scripts, and acceptance criteria

- Work in progress data, documentation, and requirements

Operations Artifacts

PCG will document and maintain the following artifacts and information related to AVS operations:

- User guide(s)
- Training curriculum and materials
- Final knowledge transfer plan
- Post-turnover results report
- Operational protocols (i.e. any documented business processes instructing PCG staff operations)

Project Management Artifacts

PCG will document and maintain the following AVS project management artifacts:

- All project management reports
- All project deliverables
- Acceptance testing plan
- Data dictionary

Turnover Plan Components

PCG's turnover plan will include the physical, electronic and informal transfer of information to PRMP and/or the incumbent, as follows:

- **Physical Knowledge Transfer**: PCG will transfer historical data, per our contract's requirements, via an encrypted hard drive by delivering this in-person to PRMPs authorized designee.
- **Electronic Knowledge Transfer**: PCG will transfer the remaining artifacts to PRMP and/or the incumbent electronically via a secure-FTP site hosted by either PRMP or the incumbent.

- **Informal Knowledge Transfer**: PCG will make key project staff available throughout the transition process to support the incumbent and/or PRMP in locating additional information, performing staff training on-site at PRMP, and/or answering any questions either electronically, in-person at PRMP, and/or over the phone.

Turnover Staffing

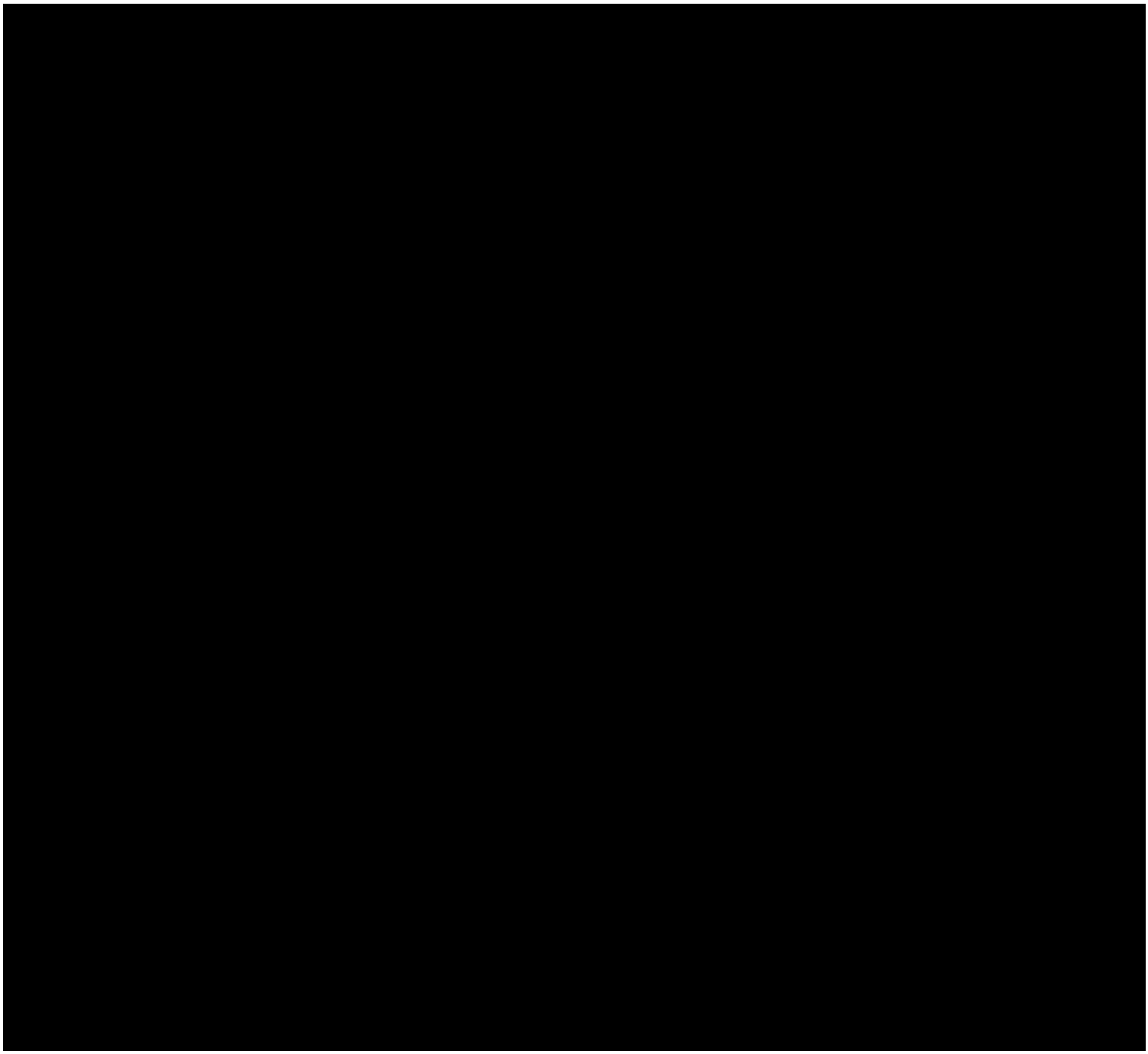
PCG will support PRMP's transition to the incumbent vendor with the following key project staff:

- **Project Manager:** PCG's AVS Project Manager will be responsible for interfacing with PRMP and the incumbent and ensuring all turnover activities are tracked and completed. PCG's Project Manager will also coordinate the availability of additional project staff, as necessary, including technical, training, and executive staff.
- **Technical Manager:** PCG's AVS Technical Manager will serve as the technical lead and work with PRMP and/or the incumbent's technical team to ensure the successful transfer and interpretation of all turnover artifacts. PCG's Technical Manager will also ensure additional technical staff are available upon request.
- **Training Manager:** PCG's AVS Training Manager will work with PRMP and/or the incumbent to transfer training artifacts and information.
- **Additional Staff:** PCG will make available additional project staff and management as requested by PRMP for six months prior to any planned turnover to another vendor.

PCG agrees to provide a form Data Transmission Plan (DTP) at least ninety days prior to the end of the contract or unless otherwise specified by PRMP.

8. Describe the proposed methodology to allow for verification requests to be sent to disclosed FIs.

In addition to our national and local account searches, PCG's AVS will allow your authorized users to request account lookups at any specific participating FIs anywhere in Puerto Rico or the United States. Directed account searches can be prompted by either your eligibility system or the users themselves. Combined with our national and local search, this functionality ensures that PCG's AVS clients can electronically verify most known accounts maintained by your clients while also identifying previously undisclosed



9. Describe the proposed methodology to allow for verification requests to be sent to undisclosed FIs as determined by the state.

In addition to supporting verification requests to any specific FI, PCG's AVS also executes each of the following searches in response to any request.

1. **National Account Search**: PCG processes all AVS requests through the Early Warning national database of accounts held at the nation's largest FIs to identify

any account maintained by a consumer at any of the nation's largest FIs anywhere in the United States. These FIs represent more than 50 percent of the depository accounts in the United States and allow PCG to quickly verify the existence of any applicant/beneficiary account at any of the FIs in the United States. One hundred percent of all PCG AVS cases are processed through this national network of FIs to ensure PCG's coverage is as comprehensive as possible.

As a no-cost enhancement, PCG is also expanding our national bank search to include up to 32 FIs, more than doubling the number that was previously available (national search previously included 13 FIs). These newly added FIs are regionally significant and will typically respond to asset verification requests within 24 hours. Additionally, because these FIs have been added to the national account search, if no accounts are found, they will not be included in the local financial institution search portion of the detection process, thus allowing the local geographic search to focus on FIs with a higher probability of holding account information for the benefits applicant.

2 **Local Account Search**: At the same time, PCG also utilizes a geographic search application to identify local and regional FIs most likely to maintain a client account based on logic such as geographic proximity to the client's address. PCG utilizes Accuity's Geographic Undisclosed Account Radial Detection solution, or GUARD, as the mechanism that determines logic by which asset verification requests are to be distributed to local and regional FIs. GUARD utilizes various FI databases and proprietary logic to optimize the probability of identifying financial institutions specific to a search for financial assets owned by an individual benefits applicant/beneficiary, primarily by looking at the geographic location of the financial institution compared to the address of the client.

4.5 Users

1. Describe the maximum number of concurrent user sessions for the proposed solution.

2. Describe any performance degradation that may result from additional concurrent user sessions for the proposed solution.

PCG's AVS can support an unlimited number of PRMP users without any system degradation. PCG's AVS is housed in a virtual private cloud in AWS and leverages AWS's auto-scaling solutions, incorporating Aurora database, API Gateway, and Elastic Beanstalk, and offers a robust and adaptable infrastructure. Aurora, a fully managed relational database service, can easily scale horizontally to handle increasing workloads by adding more storage or computing resources. API Gateway acts as a front door, managing and securing API traffic. Its scalability is ensured through auto-scaling features that adjust capacity based on demand. Elastic Beanstalk, a PaaS service, simplifies the deployment and management of web applications. It can automatically scale applications based on metrics like CPU utilization or request rate, ensuring optimal performance and resource utilization. This combined architecture provides a highly scalable solution that can accommodate growing user bases and fluctuating workloads.

As evidence, our system has been stress tested successfully at 10,000 concurrent users for 30 minutes and we maintain recent successful implementations where data footprints have exceeded 30TB of client and source data.

3. Please describe available help services for eligibility workers and IT program staff.

A primary differentiator between PCG and our competitors is PCG's emphasis on client service. PCG's team members are trained extensively to prioritize client needs and issues immediately upon identification/receipt, to keep our agency clients informed every step of

the way while we address these needs, to resolve these issues as soon as humanly possible and to provide transparent reporting around each issue, including root-cause analyses within 24 hours.

Put simply, PCG is well known for our exceptional client and customer service. So much so, in fact, that dozens of states **utilize more than 1,000 inbound and outbound PCG service representatives every day.** Leveraging three decades of call center operations and customer support experience, as well as industry-leading telephone and CRM technologies, PCG offers the following support options, the combination of which ensure PRMP and your employees are supported with transparent and timely services throughout this engagement, including:

Support Type	Description
High-Priority Technical Support	PCG's technical leadership team, led by our Technical Manager, Naresh Kommineni, will be available to PRMP for the duration of this engagement. Additionally, all PCG project team members will be available to PRMP to receive requests for technical support throughout this engagement. All reported technical support issues are logged within PCG's Team Foundation Server (TFS) and tracked and reported on until resolution. Finally, PCG's core AVS technical team has been together since 2016, ensuring PCG is able to rapidly deliver resolutions to any unforeseen technical issues.
AVS Help Desk	Additionally, PCG offers live technical support available via a dedicated phone number, fax, and a help email inbox. All reported technical issues are tracked within PCG's TFS issue resolution software. PCG offers a dedicated support email address and phone number to allow PRMP workers to report system and data errors. PCG technical support professionals can coordinate with call center staff, as necessary, to ensure timely and satisfactory

Support Type	Description
	resolutions to worker issues and/or concerns. PCG's help desk will be available, at minimum, during all PRMP business hours, including overtime hours.
Project Management Support	PCG's Project Director, Project Manager, and Associate Project Manager are available via phone and email at any time should PRMP management have questions or concerns. Our staff will also be available for in-person consultations at any time with reasonable notice.
FI Help Desk	PCG will provide live support to financial institutions either enrolled in or being recruited for your AVS program. This support will be available via phone and email during normal business hours. PCG financial institution support professionals can coordinate with PRMP call center staff, as necessary, to ensure timely and satisfactory resolutions to worker issues and/or concerns.

Figure 55.0: Help desk program support functions. Our help desk will offer PRMP technical and project management support throughout the duration of the engagement.

With extensive experience in managing and operating call centers in several states across the country for more than 30 years, PCG can immediately staff this project with experienced help desk specialists. PCG will always work with PRMP to establish reasonable resolution timeframes, and we agree to be subject to negotiated financial penalties in the event we cannot meet the reasonable, target resolution timeframes.

4. Please describe available customer service options (including for any FCRA-related inquiries) for applicants and beneficiaries with regard to asset verification.

PCG's proposed solution fully complies with the Fair Credit Reporting Act (FCRA). PCG maintains a consumer dispute resolution help desk, which allows PRMP clients to dispute

information provided by any of our FCRA data sources. PCG understands and complies with each public assistance clients' right to obtain their data file and right to dispute any inaccurate information. PCG provides dispute intake, dispute documentation, dispute communication with third-party data providers, and dispute resolution solutions, which are accessible to your public assistance clients.

5. Please detail available training options and reference materials for system users. Please provide a recommendation for a training program for initial implementation of the AVS and further on an ongoing basis.

PCG has successfully trained tens of thousands of agency eligibility workers over the past ten years using multiple approaches and tools, both in-person and virtually. During the new contract kickoff phase, PCG will work with PRMP to develop a formal Training Plan governing any required training activities.

Specifically, PCG's Training Plan will address each of the following key training considerations:

Plan Component	Description
Location and Tools	PCG will collaborate with PRMP to determine whether trainings should be facilitated through PCG's existing Learning Management System (LMS) and/or via another approach, including whether any in-person training is required.
Methodology	PCG will collaborate with PRMP to define the methodology for training, including determining whether PCG will rely on automated, Web-based, interactive trainings and/or will employ a hybrid training approach that includes activities outside of the LMS.

Plan Component	Description
Roles and Responsibilities	PCG will collaborate with PRMP to define our role in the training process, including identifying who will be reponsibile for training communications and scheduling. PCG will identify each training stakeholder, including any agency contractors, and their specific roles and responsibilities in the training process.
Training Objectives and Courses	PCG will collaborate with PRMP to define your training goals and which training topics are required, including FCRA, user access and roles, new data sources, and more.
Training Times and Review Timelines	PCG will finalize the training materials review process for the development of all training materials and corresponding documentation. PCG will define this approach within our Training Plan. PCG will also define the estimated amount of time needed for each training course.
Training Update Protocols	PCG will collaborate with PRMP to define the protocols for updating training materials, including any updates required as a result of a system release/change.
Training Support	PCG will define technical and non-technical training support options and contact methods.
Training Artifacts	PCG will catalog all training documents, materials, sites, and equipment used on the training process. PCG anticipates storing these artifacts within our Asset Verification Program project SharePoint site, which will be accessible to PRMP throughout the engagement. Additionally, PCG will provide PRMP with a user guide to support and inform training and production activities.
Training Testing and Compliance	PCG will collaborate with PRMP to define the requirements for testing and certifying training materials, preparing training locations (including virtual locations), recording, and ensuring ADA-compliance.

Plan Component	Description
Checklists and FAQs	PCG will collaborate with PRMP to define training instructor checklists, develop frequently asked questions documentation, and any post-training activities.
Training Access	PCG will define how trainees will access PCG trainings, including how to access PCG's training environment.

Figure 56.0: PCG will work with PRMP to define and execute any needed user training.

On behalf of several other PCG HHS agency asset and eligibility verification clients, PCG designed and deployed a web-based Learning Management System (LMS) for agency workers requiring training. PCG developed web-based training, including automated quizzes after each section of the training, as well as web-based final exams. PCG can leverage this LMS as directed by PRMP to facilitate and track trainings. Using an LMS to facilitate training on system updates, enhancements, and modifications will also allow your workers to take the training at their convenience.

PCG has included an example training presentation as ***Appendix 3*** of this proposal.

4.6 Maintenance

1. Describe the on-going maintenance strategy for the AVS solution.

PCG's approach to establishing and maintaining back-up and recovery procedures is defined in the previous section. Additionally, PCG leverages the AWS CloudWatch solution to monitor the performance of our AVS twenty-four (24) hours per day, seven (7) days per week and alerts PCG in real-time to any degradation of performance. PCG supplements this solution with proprietary monitoring tools which evaluate and report on system performance and availability every fifteen (15) to sixty (60) seconds, twenty-four (24) hours per day, seven (7) days per week. This solution monitors interface and server availability, usage, performance, and latency to detect any anomalous scenarios representing a potential issue in availability or performance.

The combination of each of these factors supports our ability to ensure our AVS is available twenty-four (24) hours per day, seven (7) days per week, regardless of the volume of AVS requests being submitted at any given time.

PCG doesn't stop there, however, as we take several additional steps to ensure the availability of our AVS, including:

- PCG leverages a second, separate server on AWS Elastic Compute Cloud (AWS EC2) to perform seamless, otherwise resource intensive, ETL processing.
- PCG leverages an AWS Aurora MYSQL database, which is a scalable, relational data store for transactional systems.
- PCG leverages the AWS Simple Queuing Service (SQS) and an independent AWS lambda that interfaces with a No-SQL database (AWS DynamoDB) to perform resource intensive AVS processing.
- PCG leverages AWS Auto Scale to automatically increase system bandwidth during peak utilization and processing times.

Each of the tools and technologies referenced above, combined with our three+ year track record of 99.99% availability across all of our agency AVS clients, allow us to confidently confirm that PCG's AVS can support any volume of AVS requests across an unlimited number of public assistance programs—on day one.

PCG agrees to notify PRMP within five minutes of any unplanned system outage via email and/or telephone on business days and within 24 hours on weekends or holidays.

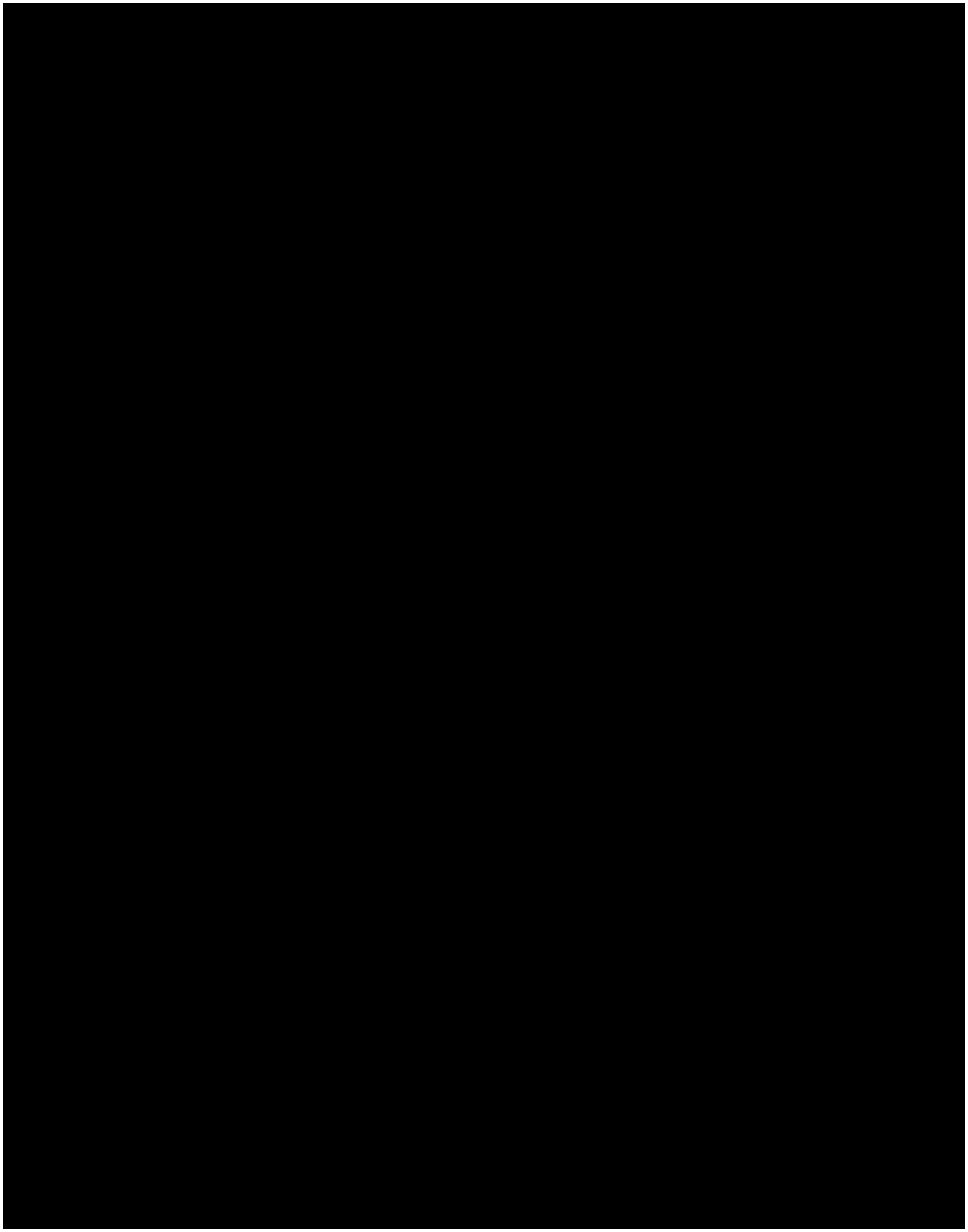


Figure 57.0: PCG has proactive tools designed to avoid incidents and outages which include automated alerts via text and e-mail.

PCG's proven experience, combined with our AWS and proprietary system monitoring tools, will ensure we will always be able to instantly respond to any system issues.

2. Describe the maintenance strategy to ensure non-intrusive maintenance.

PCG employs a number of internally developed and native AWS tools to ensure constant uptime. PCG employs off-hours maintenance scheduling and AWS Lambda task management systems to trigger the execution of after-hours tasks. AWS managed services ensure system availability, while eliminating the need for system downtime for updates and/or maintenance and ensuring regular security patching, certificate updates, and more.

In the unlikely event that maintenance becomes necessary, PCG agrees to notify PRMP a minimum of seven days in advance of a planned outage and to perform this maintenance after hours to prevent it from impacting our system's availability.

4.7 Training

1. Describe how the proposed training provides training and customer support to both state and FI staff.

2. Describe the proposed training approach and methodology.

PCG will work with PRMP to define your training needs and coordinate the scheduling and execution of these trainings. PCG's training typically includes materials, such as user guides, training presentations, frequently asked questions, virtual trainings, Web-based trainings, and instructor-led trainings. PCG will finalize training needs and requirements with PRMP during the requirements definition phase of this engagement.

Live, virtual trainings will be composed of a "classroom training", during which we will introduce our AVS and provide instructions on how to submit requests, access results, navigate and interpret these results, and use results to support client follow-up activities. We also offer additional guidance, including training materials, user guides, and videos of prior web-based trainings, as needed

PCG also agrees to provide ad-hoc training to PRMP users upon request, either via "train the trainers" trainings or through direct user trainings.

Also, on behalf of several other PCG HHS agency asset and eligibility verification clients, PCG designed and deployed a web-based Learning Management System (LMS) for agency workers requiring training. PCG developed web-based training, including automated quizzes after each section of the training, as well as web-based final exams. PCG can leverage this LMS as directed by PRMP to facilitate and track user trainings. Using an LMS to facilitate training on system updates, enhancements, and modifications will also allow your workers to take the training at their convenience.

Users will be able to access the specific training course which are required for their group and will be prompted as a new user or existing user to complete trainings according to PRMP requirements.

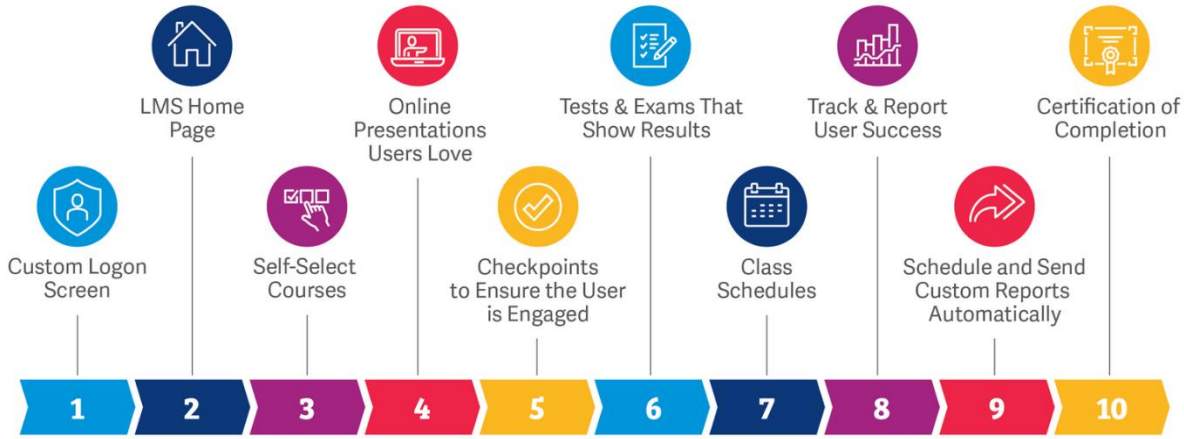


Figure 58.0: PCG's LMS makes training safe, easy, trackable, and transparent; a win-win-win-win for Puerto Rico.

Below is a snapshot of the trainings courses that are currently within PCG's LMS followed by the specific status/progress of all users:

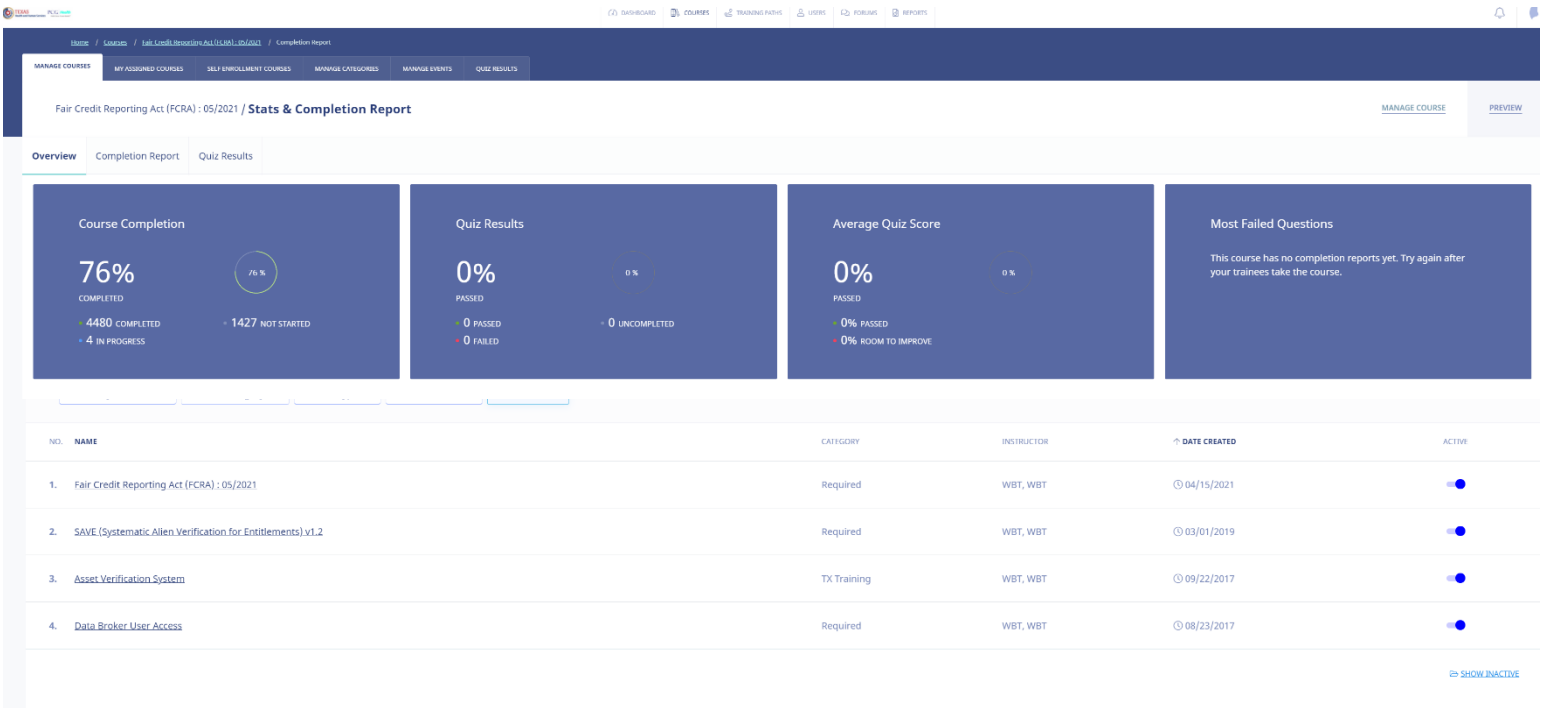


Figure 59.0: Public Consulting Group's Learning Management System Progress Board.

Finally, every newly participating FI will be trained on the correct procedures for responding to AVS requests for account balance information. User manuals and user credentials (user ID and temporary password) are distributed to these FIs in preparation for the launch of their active participation, ensuring they can respond to requests via Accuity's web application on day one. For those FIs already participating in the AVS network, they are advised that re-training opportunities are available, upon request.

PCG supplements this initially training with an FI Help Desk. Through this help desk, PCG provides live support to financial institutions either enrolled in or being recruited for your AVS program. This support will be available via phone and email during normal business hours. PCG financial institution support professionals can coordinate with PRMP call center staff, as necessary, to ensure timely and satisfactory resolutions to worker issues and/or concerns.

3. Describe the proposed training plan.

PCG has successfully trained tens of thousands of agency eligibility workers over the past 10 years using multiple approaches and tools, both in-person and virtually. During the new contract kickoff phase, PCG will work with PRMP to develop a formal Training Plan governing any required training activities.

Specifically, PCG's Training Plan will address each of the following key training considerations:

Plan Component	Description
Location and Tools	PCG will collaborate with PRMP to determine whether trainings should be facilitated through PCG's existing Learning Management System (LMS) and/or via another approach, including whether any in-person training is required.
Methodology	PCG will collaborate with PRMP to define the methodology for training, including determining whether PCG will rely on automated, Web-based, interactive trainings and/or will employ a hybrid training approach that includes activities outside of the LMS.
Roles and Responsibilities	PCG will collaborate with PRMP to define our role in the training process, including identifying who will be reponsibile for training communications and scheduling. PCG will identify each training stakeholder, including any agency contractors, and their specific roles and responsibilities in the training process.
Training Objectives and Courses	PCG will collaborate with PRMP to define your training goals and which training topics are required, including FCRA, user access and roles, new data sources, and more.

Plan Component	Description
Training Times and Review Timelines	PCG will finalize the training materials review process for the development of all training materials and corresponding documentation. PCG will define this approach within our Training Plan. PCG will also define the estimated amount of time needed for each training course.
Training Update Protocols	PCG will collaborate with PRMP to define the protocols for updating training materials, including any updates required as a result of a system release/change.
Training Support	PCG will define technical and non-technical training support options and contact methods.
Training Artifacts	PCG will catalog all training documents, materials, sites, and equipment used on the training process. PCG anticipates storing these artifacts within our Asset Verification Program project SharePoint site, which will be accessible to PRMP throughout the engagement. Additionally, PCG will provide PRMP with a user guide to support and inform training and production activities.
Training Testing and Compliance	PCG will collaborate with PRMP to define the requirements for testing and certifying training materials, preparing training locations (including virtual locations), recording, and ensuring ADA-compliance.
Checklists and FAQs	PCG will collaborate with PRMP to define training instructor checklists, develop frequently asked questions documentation, and any post-training activities.
Training Access	PCG will define how trainees will access PCG trainings, including how to access PCG's training environment.

Figure 60.0: PCG will work with PRMP to define and execute any needed user training.

4. Describe the role and experience of the proposed Key Trainers.

Brenda Baldwin, MSA, who serves as PCG's Operations Lead, is also our Training Manager. Brenda is a PCG Senior Advisor with nearly two decades of experience in public sector welfare eligibility operations. In her capacity with PCG, Ms. Baldwin has managed high profile asset verification training operations on behalf of the New York State Department of Health, Maryland Department of Human Services, Delaware Division of Medicaid and Medical Assistance, South Dakota Department of Social Services, Oregon Department of Human Services, Wisconsin Department of Human Services, New York City Human Resources Administration/Department of Social Services, Arizona Health Care Cost Containment System, Colorado Department of Health Care Policy and Financing, District of Columbia Department of Human Services, Massachusetts Executive Office of Health and Human Services, Minnesota Department of Human Services, Nebraska Department of Health and Human Services, Oklahoma Health Care Authority, Rhode Island Executive Office of Health and Human Services, Tennessee Division of TennCare, Utah Department of Workforce Services, Vermont Department of Health Access and Washington Health Care Authority

In her capacity as Training Manager, Brenda will oversee and execute all AVS trainings, while also working with PRMP to define your training needs and requirements, and the required content associated with any web-based training courses.

Brenda will also coordinate with PRMP to schedule trainings, communicate these trainings to agency users, survey training attendees, deliver training materials, and document and respond to any issues, suggestions, or updates that come out of the trainings.

5. Describe the training on any necessary tools and methodologies used and provide a sample curriculum and user guide.

6. Provide sample training materials.

PCG will collaborate with PRMP to define the methodology for training, including determining whether PCG will rely on automated, Web-based, interactive trainings and/or will employ a hybrid training approach that includes activities outside of the LMS.

PCG will collaborate with PRMP to define our role in the training process, including identifying who will be responsible for training communications and scheduling. PCG will identify each training stakeholder, including any agency contractors, and their specific roles and responsibilities in the training process.

PCG will finalize the training materials review process for the development of all training materials and corresponding documentation. PCG will define this approach within our Training Plan. PCG will also define the estimated amount of time needed for each training course.

PCG will catalogue all training documents, materials, sites, and equipment used on the training process. PCG anticipates storing these artifacts within our Asset Verification Program project SharePoint site, which will be accessible to PRMP throughout the engagement. Additionally, PCG will provide PRMP with a user guide to support and inform training and production activities.

At minimum, trainings will include the following content:

- Why are agencies using AVS
- How does AVS work
- How to register new users
- How to login to the AVS Portal
- How are FIs canvassed nationally and locally
- How to submit AVS requests
- How to submit verification requests to specific FIs

- How are cases assigned
- How are cases retrieved
- How are cases organized
- How to search for cases
- How to assign cases to specific users and/or user groups
- How to close a case
- How to navigate different portal screens
- How to interpret AVS results
- Account view vs. month view
- Accounts received after decision
- Property results
- Motor vehicle results
- Flags and eligibility predictions
- Exporting AVS reports
- Eligibility/case history
- Standard report types
- User-driven reporting dashboard
- User support options and contact information
- FCRA dispute resolution protocol and contact information
- AVS User Guide
- FAQs

PCG has trained tens of thousands of AVS users across the country and our training team will ensure PRMP users have the information they need, when and where they need it, to be successful.

PCG has provided Training Materials as ***Appendix 3*** of this proposal and our User Guide as ***Appendix 4*** of this proposal.

7. Provide a sample of training survey.

PCG has provided a sample training survey as ***Appendix 5*** of this proposal.

4.8 Network Security and Operations

PCG's AVS is hosted in a virtual private cloud in AWS, deemed FedRAMP-moderate. PCG's AVS is a MARS-E 2.0–compliant solution and both PCG and our AWS cloud are governed by annual SOC2 Type II audits and corporate information security controls based on NIST 800-53 v.5 standards.

1. Describe the vendor hosted solution facility physical security features, including intrusion prevention/detection.

PCG's AVS is hosted in an AWS virtual private cloud, deemed FedRAMP moderate. As a result, neither PCG nor PRMP needs to worry about physical intrusion as the system is cloud-based.

2. Describe the Vendor hosted solution facility's data and network security features including intrusion prevention/detection.

PCG uses a web application firewall (WAF) to control network traffic and encrypts data both in transit and at rest. Data is encrypted before being uploaded to S3 storage and is further protected by S3 server-side encryption. PCG also employs automated application security testing (DAST and SAST) throughout any engagement.

All requests to PCG's load balancer go through our firewall and any unauthenticated requests are blocked here. PCG's load balancer listens only to HTTPS (443) connections and routes requests to our web server. PCG's lambda functions access our database internally inside our private subnet. PCG's memcached server is in a private subnet and only listens to our web server. PCG's database (primary and secondary) are in a private subnet and data is encrypted via AES 256.

3. Describe the vendor hosted solution facility's backup power capabilities, including the timeframe for restoration of normal AVS processing.

All AVS requests and results are copied upon receipt and prior to sending, respectively. Further, PCG utilizes AWS's infrastructure to backup and store all project data for as many additional years as the State requires. AWS allows PCG to log, monitor, and retain storage API and ETL call activities for auditing, copies data across a minimum of three AWS facilities, supports three forms of encryption, and adheres to security standards and certifications, including SEC Rule 17a-4, PCI-DSS, HIPAA/HITECH, FedRAMP, EU Data Protection Directive, FISMA, FIPS 140-2, and more. Additionally, the AWS CloudTrail product logs, continuously monitors, and retains all account activity and actions across PCG's cloud-based data warehouse. CloudTrail maintains event history of all actions taken and analyzes these actions to support troubleshooting, compliance assurance, and operational auditing.

PCG leverages the AWS Elastic Block Store (Amazon EBS) to provide persistent block level storage volumes for use with our EC2 instance in the AWS Cloud. Each Amazon EBS volume is automatically replicated within its Availability Zone to protect from component failure, offering high availability and durability. PCG archives our databases per the following schedule:

1. Two active copies of the production database always (Ohio and N Virginia AWS Regions)
2. They are imaged hourly for 48 hours (we have 48 copies to roll back to)
3. Each daily image is archived for 30 days
4. Each weekly image is archived for 12 weeks
5. Each monthly image is archived for 52 weeks
6. Each quarterly image is archived for 3 years
7. Each yearly image is archived for perpetually

PCG has also developed an enterprise-wide data destruction program that allows for consistent, secure disposal of data throughout all of our company. This program includes both destruction of hard and soft copies of data. Every PCG office has at least one, if not more, secure shredding bin that is processed by a SOC2-certified vendor to ensure secure disposal of any confidential data that has been printed from PCG systems or for PCG. Soft copies (data on electronic devices) are handled in two different ways, depending on whether the device is to be re-used or not. If the device is to be re-used within PCG, it is fully sanitized and wiped (using DoD 5220.22-M standards) to ensure no data is remaining when it moves on to its secondary use. If a device is to be destroyed, it is sent for secure disposal and destruction with a SOC2-certified company that provides a certification of destruction for each and every device, as stated in PCG's media sanitization policy and standards.

PCG can transition to a backup of our AVS in minutes in the unlikely event of a catastrophic outage.

4. Describe the Vendor hosted solution's disaster recovery/ continuity of Operations capabilities, including the timeframe for restoration of normal AVS processing.

5. Describe the Vendor hosted solution's facility's redundant communications capabilities, including timeframe for restoration of normal AVS processing.

PCG also leverages the AWS CloudWatch solution to monitor PCGOne performance and alert PCG in real-time to any degradation of performance. PCG supplements this solution with proprietary monitoring tools which evaluate and report on system performance and availability every fifteen (15) to sixty (60) seconds, twenty-four (24) hours per day, seven (7) days per week. This solution monitors interface and server availability, usage, performance, and latency to detect any anomalous scenarios representing a potential issue in availability or performance and alerts systems personnel via both text message and email in the event a potential issue is detected.

PCG leverages dozens of native AWS and PCG tools to ensure the continuity of our client systems, data, and services. All PCG data is stored domestically with the primary data center located in Virginia and the backup data center located in Ohio. PCG does not allow any production data to be accessed or stored outside of the United States at any time.

PCG uses the AWS native Backup, a centralized tool, that allows us to perform backups and snapshots of the services (EC2, RDS, EBS). This includes Amazon Elastic Compute Cloud (Amazon EC2), Amazon Elastic Block Store (Amazon EBS), and Amazon Relational Database Service (Amazon RDS). We use a Tag-Based back up policy that fully backs up any resource in AWS containing a specified PCG back up tag.

PCG also performs a policy-based, full retention, automation of backups using the AWS Backup service on a Daily, Weekly, Monthly, and Yearly Basis. AWS' EBS includes high availability/fault tolerance (HA/FT) built in at the redundant level that goes beyond normal, standard disk conventions of fault tolerance, ensuring the Department will never see a disk failure with PCG's proposed verification service. We archive all the instances and databases to AWS S3 Glacier and retain it for up to 10 years.

PCG can instantly restore a problematic server instance in minutes rather than hours via a remote HTTPS connection or remote Command Line Interface (CLI). PCG can restore an RDS database instance under 1 hour. PCG leverages Aurora Database service to avoid the need to restore any instances utilizing AWS' management of our database cluster.

PCG can also restore or back up to any of 24 AWS Regions containing multiple distinct locations called Availability Zones, or AZs. Of the 76 AWS AZs, each is engineered to be isolated from failures in other AZs. Each is also engineered to provide low-latency network connectivity to other AZs in the same AWS Region.

PCG is currently using 2 AWS regions and 8 AZs to back up our solution and data. When we chose the Multi-AZ option, AWS automatically provisioned and maintained a

secondary standby database instance in a different AZ. Our primary database instance is synchronously replicated across AZs to the secondary instance. This approach helps provide data redundancy and failover support, eliminate I/O freezes, and minimize latency spikes during system backups.

This Disaster Recovery Plan outlines the recovery process for two potential types of outages. The first, “AWS Recovery Procedure” is the procedure for an AWS server incident or outage, which would directly impact the AVS. In the event of an AWS-related incident, PRMP will be involved in the decision to declare a disaster, and potentially involved in the initial incident detection.

PCG’s application, database, and web servers will be hosted primarily out of AWS’s East geographic region in Northern Virginia, which contains five discrete data centers. The Data Broker Services application is architected to leverage at least two of these discrete data centers at all times. In the event of a failure at one, application services will remain available at the other while repairs are made. In the event of loss of accessibility to the entire East region, PCG will be able to reconfigure and re-deploy the server architecture in AWS’s West regions (California or Oregon), or its second East region (Ohio) within twenty-four (24) hours. Any alternate AWS region has the capacity to sustain all of PCG’s stakeholders and hosting the environment in an alternate region will not cause a noticeable impact to response time. Each alternate region (Ohio, California, and Oregon) contains three discrete data centers.

PCG would be pleased to provide additional details on our disaster recovery and business continuity policies, plans, and procedures, upon request.

6. Describe the notification process, including maximum timeframe, to be used in case of an event.

In the event of an incident or outage, PCG's Project Manager will notify PRMP informally within five (5) minutes and will provide a formal after-action report and root cause analysis within twenty-four (24) business hours.

4.9 Management Plan

1. Include a chart showing how the project will be organized, including all tasks and deliverables and the overall leadership, business management, task or team leader and staff for each part.

In the following table, PCG has summarized our responsibilities, tasks, and deliverables and has identified the PCG resources who will be responsible for each.

Activity	Description	PCG Staff
Kick-off Meeting	PCG will travel to Puerto Rico to meet with your key project stakeholders, review our approach and responsibilities, and kick-off the project.	**Lead**: Account Director **Other Contributors**: PMO Director, Project Manager, Associate Project Manager, Technical Manager
Deliverables Creation	PCG will need to create all key project artifacts and deliverables for the agency's review and approval.	**Lead**: PMO Director, Project Manager **Other Contributors**: Associate Project Manager, Operations Manager, Technical Manager, Software Engineering Manager, Consultant
Communications Approach Definition	PCG will need to draft our communications plans and templates, including our Stakeholder Matrix,	**Lead**: PMO Director, Project Manager **Other Contributors**: Associate Project Manager,

Activity	Description	PCG Staff
	Communications Management Plan, and report templates.	Operations Manager, Consultant
Planning and coordination with Puerto Rico's Municipal Revenue Collection Center, Department of Transportation and Public Works, Office of the Commissioner of Navigation, and Bureau of Transportation and Other Public Services	PCG will need to coordinate with these other agencies to (a) identify contacts for development, (b) define schema and requirements, (c) implement, (d) test, and (e) maintain connectivity with these agencies.	**Lead:** Project Manager, Technical Manager **Other Contributors:** Associate Project Manager, Technical Manager, Software Engineering Manager, Software Engineering Lead, Consultant
Financial Asset Configurations	PCG and PRMP will need to define the financial asset configuration thresholds based on the Puerto Rico-specific eligibility policy associated with every type of assistance + household size variation, as well as the configurations associated with PCG's	**Lead**: Project Manager **Other Contributors**: Associate Project Manager, Technical Manager

Activity	Description	PCG Staff
	automated flags of potentially disqualifying criteria.	
Property Configurations	PCG and PRMP will need to define the property configuration thresholds based on the Puerto Rico-specific eligibility policy associated with every type of assistance + household size variation, as well as the configurations associated with PCG's automated flags of potentially disqualifying criteria.	**Lead**: Project Manager **Other Contributors**: Associate Project Manager, Technical Manager
Motor Vehicle Configurations	PCG and PRMP will need to define the property configuration thresholds based on the Puerto Rico-specific eligibility policy associated with every type of assistance + household size variation, as well as the configurations associated with PCG's automated flags of potentially disqualifying criteria.	**Lead**: Project Manager **Other Contributors**: Associate Project Manager, Technical Manager

Activity	Description	PCG Staff
Direct Integration Specifications	PCG will need to work with PRMP to finalize the specifications and requirements related to directly integrating our AVS into your Medicaid eligibility data system.	**Lead**: Project Manager, Technical Manager **Other Contributors**: Associate Project Manager, Technical Manager, Software Engineering Manager, Software Engineering Lead, Consultant
User Acceptance Testing	PCG will support PRMP's user acceptance testing when integrating AVS into your Medicaid eligibility data system.	**Lead**: Project Manager, Technical Manager **Other Contributors**: Associate Project Manager, Technical Manager, Software Engineering Manager, Software Engineering Lead, Consultant
Training	PCG and PRMP will work together to define your training needs, coordinate scheduling, finalize the curriculum and approach, and execute trainings.	**Lead**: Training Manager (Operations Manager) **Other Contributors**: Project Manager Associate Project Manager, Consultant
Weekly and Monthly Meetings	PCG will schedule regular collaborative meetings with the State to review milestones, deliverables and requirements,	**Lead**: PMO Director, Project Manager **Other Contributors**: Associate Project Manager,

Activity	Description	PCG Staff
	and asset verification results, particularly during early stages of this engagement.	Operations Manager, Technical Manager, Consultant
Service and Support	PCG will provide ongoing service and support during all normal business hours to PRMP.	**Lead**: Operations Manager **Other Contributors**: Project Manager, Associate Project Manager, Consultant, Technical Manager, Software Engineering Lead

Figure 61.0: PCG's summary areas of responsibilities and leads.

2. Include a timeline or schedule of task and subtask starts, endings and milestones.

On the following pages, PCG has detailed our implementation work breakdown structure.

High-integrity stewardship of public resources and trust through the application of best practices and the adoption of **proven project management tools and methods**. PCG grounds our management of project scope, timeline, and budget in the Project Management Institute's tried and tested PMBOK tools and methods, which flex the project management specifics to the unique needs and requirements of each engagement.

A grounding in **evidence-based, best-in-class practices, tools, and methods**. PCG stays connected to cutting-edge research across a wide range of fields of study, conducts action research in partnership with our customers, analyzes best-in-class practices, tools, and methods in state government, and crafts government solutions that draw on the full range of insights from both external scanning and proprietary research and development.

A commitment to **helping our customers achieve sustainable change**. PCG wants our customers to move from where they are now to where they want to be, in ways that maximize the likelihood that those changes will "stick" over the long-term. Our AVS recommendations will always reflect this commitment to sustainable change.

A **customer-focused strategy**. PCG works closely with our agency customers to understand their specific challenges, opportunities, and requirements in order to customize all aspects of each engagement to reflect the agency's specific context, rather than applying a standard asset verification system "template" to each engagement.

The method of performance that we will employ under this engagement has been tested, refined, and proven successful. PCG maintains the resources, experience, and tools to ensure both Puerto Rico's uninterrupted use of PCG's AVS, including any enhancements, are appropriately met and each stakeholder agency is able to successfully utilize PCG's service based on their unique schedules and requirements.

PCG's approach to any agency engagement is simple: "***Plan the Work and Work the Plan***." Our project managers live by this day in and day out and our commitment to Puerto Rico is that we will do the same for you, as summarized on the following pages.

Communications. PCG understands that consistent two-way communication is critical to the success of any AVS project. At the outset of this engagement, PCG will coordinate with the State's team to establish a formal Communications Plan. PCG's Communication Plan will identify each internal and external project stakeholder, what they need to know, and when they need to know it. This plan will also define our communications and meeting schedule, assign responsibilities for communications, and identify each stakeholder's preferred means of receiving communications from PCG. Finally, PCG will define PRMP's requirements, the content of each report, and the timing of the report delivery.

PCG will provide our formal Communication Plan to PRMP within fifteen (15) days following the contract effective date. This plan will be reviewed, updated, and provided to PRMP annually, thirty (30) days prior to the end of each operational year.

Change Management. PCG maintains a deep pool of hundreds of development and technical experts supporting a fully configurable AVS, and we provide PRMP on-demand access to more than 200 additional data sources via our PCGOne platform and our Multiplexer API. For these reasons, PCG can easily and efficiently accommodate nearly any reasonable foreseen or unforeseen change without impacting PRMP's AVS. Further, because PCG is currently operating AVS on PRMP's behalf, most enhancements to our service would be limited in terms of cost, time, and effort.

PCG's change management process includes each of the following activities:

1. **Change Identification** – Defining the desired change with sufficient detail to allow for the preliminary analysis to be performed.
2. **PRMP Collaboration** – Meeting or discussing the change with appropriate stakeholders and subject matter experts to gain in-depth knowledge of the desired

change and to begin assessing any impacts to various portions of the project (contract, policy, training, users, etc.).

3. **High Level Estimate (HLE)** – Developing an initial estimate on the costs of the identified change, represented as a breakdown of hours by resource type. This initial estimate would be refined during the collaboration and charter development stages. The HLE is an optional item as directed by PRMP. The HLE will be requested by PRMP with either the identification of a change or during the collaboration step.
4. **Develop Charter** – Developing a charter to include information on scope, schedule, impacts, risks, assumptions, constraints, and level of effort. Although user stories will not be included in the Charter, high-level epics may be included. A component of the charter will be PCG's cost estimate or cost proposal.
5. **Change Order Request** – If the change warrants a contract amendment, then a Change Order Request will be drafted. The change order initiates the contract amendment process and can be attached to the contract amendment to support either the costs or scope of the change.
6. **Develop Change** – Upon PRMP approval of the charter, PCG will commence with the development of the user stories to finalize the scope and to define the requirements of the change.
7. **Implement Change** – Following the successful testing of the change and PRMP's acceptance, the change can be released into production.

PCG will deliver our formal Change Management plan to PRMP for approval within fifteen days of contract execution.

Contract Management. At the outset of any engagement, PCG documents all project commitments from our proposal, the agency's RFP, and our contract (including any supplementary documents) within both our formal Project Management Plan, as well as our work breakdown structure, and the Requirements Elaboration Document. PCG maintains accountability by tracking the status of all required tasks and activities within

our work breakdown structure and weekly, monthly reporting, and in the readiness assessment process prior to going live.

Quality Management. PCG's Quality Management Plan will detail the strategy, scope, approach, roles and responsibilities, and schedule for all quality activities related to the project. This artifact will also describe both manual and automated quality monitoring activities and solutions. Our approach to quality assurance is largely focused on prevention to ensure that risks are identified and mitigated before an issue arises, and include the following measures:

- **Project and Risk Management Planning**: When PCG initiates any project, we define every risk, identify contingencies, and document mitigation strategies. We "plan the work and work the plan" to ensure that our approach addresses the full scope of work, and we will deliver dozens of project management artifacts (defined in the Work Plan in the previous section) governing our activities throughout the project.
- **System Performance Monitoring**: PCG's verification service includes automated performance monitoring via AWS' CloudWatch solution. CloudWatch provides PCG with data, alerts and actionable insights which allow us to ensure the performance of our AVS in real-time while quickly and appropriately responding to system issues, to optimize resource utilization, and to get a unified view of the health of our system. CloudWatch collects monitoring and operational data in the form of logs, metrics, and events, and generates a unified view of resources, applications, and services that run on AWS and on-premises servers. PCG uses CloudWatch to detect anomalous behavior in our system environments, set alarms, visualize logs and metrics side by side, take automated actions, troubleshoot issues, and discover insights to keep our verification service running smoothly. PCG supplements our use of CloudWatch with additional performance monitoring tools, including MoveIt alerts and Google Analytics site activity monitoring. Any system performance issues flagged by PCG's monitoring tools

result in the automatic generation of email and text-based alerts to the PCG project management and technical team members.

- **Live Support**: PCG provides multiple live support options, including project support, technical support, FI support, and support from each of our data providers during all normal business hours.
- **Web-based Bug Resolution Tracking**: PCG tracks any and all bugs via the Microsoft Team Foundation Server (TFS) technical delivery platform. PCG will provide the State with access to PCG's TFS to give you a real-time view of the status of any outstanding bugs or issues and will include statuses in weekly and monthly reports.
- **Agile Development Process**: PCG utilizes a scrum-based, Agile approach to integration. At the conclusion of each two-week sprint, PCG demonstrates completed functionality and obtains client sign-off based on previously agreed upon user acceptance criteria. By demonstrating our progress every two weeks, PCG ensures that progress is consistent and demonstrable. Any issues identified are corrected early, rather than waiting for a surprise go-live at the conclusion of the entire development process.
- **Regularly Scheduled and Ad Hoc Meetings and Reports**: PCG will schedule weekly check-ins during implementation and monthly check-ins following go-live. PCG also performs open daily scrum calls and bi-weekly sprint demonstrations, both of which the State is welcome to attend at any time. PCG will submit regularly scheduled and ad hoc reporting throughout the life of this project to ensure that the State always has an up-to-date view of all project activities. Additionally, PCG agrees to create any ad hoc reports for the State upon request for the duration of this engagement.
- **Issue Notification**: In the event of an outage, incident, or breach, PCG shall notify the State informally within five minutes and formally within 24 hours. Informal notification will take place via phone or email, while formal notification will be in writing and include an incident report, root cause analysis, and an issue resolution plan.

- **End-to-End Regression Testing**: Prior to go-live and prior to any sprint release, PCG employs end-to-end testing to determine whether any changes made to our AVS will impact any other areas or functions of our service. This regular, end-to-end testing ensures that PCG's consistent, high-quality service will be uninterrupted in the event of technical releases.

The combination of these tools, processes, and activities – combined with PCG's expert, certified Project Management Professionals, will ensure the ongoing, transparent quality and performance of our AVS on PRMP's behalf.

Deliverable Management. At the inception of any new contract, PCG formally documents our project management and operational processes to ensure adequate governance, controls, and documentation are in place to mitigate any potential risks to the project and to expedite any decisions impacting the project. During the initial phase of the new contract, PCG will submit to the State drafts of each of the following artifacts defining and governing PCG's project activities:

- Project Plan
- Monthly Performance Report Template
- Communications Plan
- Interface Control Document
- Requirements Elaboration Document
- Sprint Plan
- User Stories
- Master Project Management Plan
- Change Management Plan
- Quality Management Plan
- Risk & Issue Management Plan
- Disaster Recovery and Business Continuity Plan
- Readiness Assessment Plan
- Monthly FI Participation Reports

- Monthly FIs Failing to Participate Reports

By formally documenting our activities and controls, PCG can proactively avoid and mitigate potential project risk.

Any PCG AVS project award will result in the creation and maintenance of a SharePoint document repository, which PCG will use to organize and store all project management artifacts on PRMP's behalf. This ensures organization and appropriate version control throughout the project lifecycle while providing our agency clients with on-demand access to the most recent versions of key project artifacts.

4.10 Post-Implementation Support

Provide details on vendor SLA technical support that will be provided post go-live including but not limited to response and resolution time for issue severity and Points of Contact (POCs).

PCG leverages the AWS CloudWatch solution to monitor the performance of our AVS twenty-four (24) hours per day, seven (7) days per week and alerts PCG in real-time to any degradation of performance. PCG supplements this solution with proprietary monitoring tools which evaluate and report on system performance and availability every fifteen (15) to sixty (60) seconds, twenty-four (24) hours per day, seven (7) days per week. This solution monitors interface and server availability, usage, performance, and latency to detect any anomalous scenarios representing a potential issue in availability or performance.

The combination of each of these factors supports our ability to ensure our AVS is available twenty-four (24) hours per day, seven (7) days per week, regardless of the volume of AVS requests being submitted at any given time. PCG agrees and guarantees that our AVS will exceed 99.999% uptime.

PCG doesn't stop there, however, as we take several additional steps to ensure the availability of our AVS, including:

- PCG leverages a second, separate server on AWS Elastic Compute Cloud (AWS EC2) to perform seamless, otherwise resource intensive, ETL processing.
- PCG leverages an AWS Aurora MYSQL database, which is a scalable, relational data store for transactional systems.
- PCG leverages the AWS Simple Queuing Service (SQS) and an independent AWS lambda that interfaces with a No-SQL database (AWS DynamoDB) to perform resource intensive AVS processing.

- PCG leverages AWS Auto Scale to automatically increase system bandwidth during peak utilization and processing times.

Each of the tools and technologies referenced above, combined with our three+ year track record of 99.99% availability across all of our agency AVS clients, allow us to confidently confirm that PCG's AVS can support any volume of AVS requests across an unlimited number of public assistance programs—on day one.

PCG agrees to notify PRMP within five minutes of any unplanned system outage via email and/or telephone on business days and within 24 hours on weekends or holidays.

Additionally, PCG leverages AWS Lambda and other database-oriented task management systems (e.g., MYSQL Events) to trigger the system maintenance tasks that will run after hours. This allows PCG to forego any maintenance during PRMP business hours. However, should maintenance become necessary, PCG agrees to notify PRMP a minimum of seven days in advance of a planned outage and to confirm system unavailability within one hour before or after the system was unavailable.

PCG's technical leadership team, led by our Technical Manager, Naresh Kommineni, will be available to PRMP for the duration of this engagement to provide support. Additionally, all PCG project team members will be available to Puerto Rico to receive requests for technical support throughout this engagement.

All reported technical support issues are logged within PCG's Team Foundation Server (TFS) and tracked and reported on until resolution. Finally, PCG's core AVS technical team has been together since 2016, ensuring PCG is able to rapidly deliver resolutions to any unforeseen technical issues.

4.11 Project Deliverables

Project deliverables are a comprehensive guide for managing the Asset Verification System, ensuring smooth functioning and alignment with the organization objectives.

At the inception of any new contract, PCG formally documents our project management and operational processes to ensure adequate governance, controls, and documentation are in place to mitigate any potential risks to the project and to expedite any decisions impacting the project. During the implementation phases, PCG will submit to the State drafts of each of the following artifacts defining and governing PCG's project activities:

- **Master Project Management Plan:** PCG will draft a detailed Project Management Plan to define project objectives, activities, deliverables, governance, methodologies, resources, and tools. This document will serve as PCG's dictionary for all project activities which need to take place in order to fulfill our contracted scope of work. We will consider this plan to be a living document, and we will update it regularly to reflect any change in processes, protocols, or scheduling.
- **Project Work Plan**: PCG's most important project artifact is our Implementation Project Work Plan, which will serve as a detailed framework for illustrating the primary and secondary subdivision of 100 percent of the tasks and deliverables for the duration of the project.
- **Staffing Plan**: PCG will submit a final staffing plan describing our staffing approach, team organizational structure, and the responsibilities and duties of each team member. PCG commits to using the same team members identified within this proposal, except in the unlikely event of an unanticipated employee departure from PCG.
- **Change Management Plan**: PCG will propose a preliminary Change Management Plan for PRMP's review during the project setup phase, to be finalized during the requirements definition phase. This process will be designed to:

- Manage and control scope change during the project.
- Ensure that the project or change is implemented on time and within the approved budget and scope.
- Evaluate and prioritize all changes to the project.
- Provide a process for implementing approved changes.
- PCG's Change Management Plan details the change management process, including systems, processes, documents, and tools to be used, as well as the stakeholders to be involved. During the requirements definition phase, PCG will review this process with Puerto Rico until final approval is granted.

- **Risk/Issue Management Plan:** The purpose of the Risk/Issue Management Plan is to define how risks and issues associated with the AVS project will be identified, analyzed, and managed. This plan will outline how risk and issue management activities will be performed, recorded, and monitored throughout the project life cycle and provides templates and practices for recording and prioritizing risks and addressing issues.
- **Quality Management Plan:** The purpose of the Quality Management Plan is to describe the strategy, scope, approach, roles and responsibilities, and schedule for all quality activities related to the project. This artifact will describe both manual and automated PCG quality monitoring activities and solutions.
- **Service and Support Plan**: PCG provides multiple forms of agency and user support in the provision of our asset verification service, including technical support, project support, and support from our data providers. During the requirements definition phase, PCG will review this support, how to access it, and its availability to ensure it meets Puerto Rico's needs and requirements.
- **Master Training Plan**: PCG will work with PRMP to define your training needs and coordinate the scheduling and execution of these trainings. PCG's training typically includes materials, such as user guides, training presentations, frequently asked questions, virtual trainings, Web-based trainings, and instructor-led trainings. PCG will finalize training needs and requirements with Puerto Rico during the requirements definition phase of this engagement.

- **Communications Management Plan**: This plan will also define our communications and meeting schedule, assign responsibilities for communications, and identify each stakeholder's preferred means of receiving communications from PCG. PCG will define PRMP's reporting requirements, the content of each report, and the timing of the report delivery. The final version of this deliverable will identify each internal and external project stakeholder, what they need to know, when they need to know it, and how we will communicate it to them.
- **Report Templates**: PCG will submit updated draft Weekly Status Report and Monthly Performance Report templates for the State's review and approval. This will ensure that we are providing all of the information the State will need on an ongoing basis.

All PCG deliverables and artifacts will undergo a secondary review prior to submission to ensure a high-level of quality and completeness. This review will, at a minimum, check the artifact to ensure that it is:

- Clear and unambiguous
- Free of typographical or grammatical errors
- Professional
- Accurate
- Complete

PCG will submit each deliverable to Puerto Rico for approval and each version of each of these deliverables will be stored within PCG's project SharePoint site, accessible to PRMP personnel at any time.

By formally documenting our activities and controls, PCG can proactively avoid and mitigate potential project risk.

A. Implementation Plan and Timeline

Vendors must detail an implementation plan that aligns with the milestone's dates. A graphic version of the plan may be included as an attachment. The Implementation Plan and Timeline should be based upon initial approval of this deliverable by PRMP. At minimum, the Implementation Plan and Timeline should be delivered within the first 30 days of the contract. Please provide those tasks that are on the critical path and provide the tasks that will require assistance from PRMP resources.

PCG has included a copy of our detailed implementation plan as ***Appendix 6*** of this proposal.

B. Updated Implementation Plan and Timeline

The Contractor must submit an updated implementation plan and timeline each month. Submitted with each Implementation Plan and Timeline should be a document that details the changes made to the Implementation Plan and Timeline since the prior submitted version. This Implementation Plan and Timeline should show all task details with responsibilities, timelines, durations, milestone dates, deliverable dates, and vendor personnel hours by deliverables for each phase, personnel hours necessary by phase and deliverable, and all critical dependencies for the project's milestones and deliverables.

PCG's certified project management professionals will provide Puerto Rico with an updated implementation plan each month that includes all required elements, including tasks, dates, responsibility, personnel, durations, etc.

C. Operations Phase Plan

Vendors must submit an Operations Phase Plan that includes:

1. Outline the deployment process, installation, configuration, and integration with existing system.

PCG will work with PRMP to achieve the following deployment, configuration, and integration processes required to successfully go live with Puerto Rico's new asset verification system:

- Establish database
- Develop PRMP call to PCG gateway
- Develop system authentication
- Establish SFTP connectivity
- IP allow PRMP IP addresses
- Establish CRIM connectivity
- Establish DRNA connectivity
- Establish DTOP connectivity
- Establish NTSP connectivity
- Develop PRMP to PCG request and response process
- Map the API response to PRMP
- Configure data sources
- Implement bank file
- Turn on Accuity data source
- Turn on LexisNexis data source
- Turn on TransUnion data source
- Configure AVS Portal based on agency-provided configurations
- Implement SSO, if desired, or register users and allow-list IP addresses if not

PCG utilizes a scrum-based, Agile approach to development. PCG develops user stories defining the development requirements of chunks of the solution and PCG executes the development through two-week sprint cycles. All user stories are captured within PCG's Team Foundation Server (TFS) and submitted to the Agency for approval. Sprints are comprised of daily scrums, with each developer maintaining clear responsibilities as

defined in the user story. At the conclusion of each sprint, PCG tests, validates, and demonstrates the completed code changes and obtains client sign-off based on previously agreed-upon user acceptance criteria. By demonstrating our progress every two weeks, PCG ensures that progress is consistent and demonstrable. Any issues are identified and corrected early, rather than waiting for a surprise at the conclusion of implementing any changes or enhancements.

2. Detail the allocation of personnel, equipment and budget required for operations.

Based on PCG's success implementing AVS in 30 other states, PCG understands the personnel and time requirements associated with an AVS implementation and we have staffed this project accordingly.

PCG's AVS is a data solution with a complementary web-based application. Therefore, there is no equipment required for this implementation.

PCG provides this service on an at-risk basis, meaning that Puerto Rico is not responsible for any costs beyond what we have included in our cost proposal. Therefore, project budgeting is unnecessary as far as PRMP is concerned.

3. Identify potential risks and mitigation strategies to minimize disruptions to operations.

One obvious yet important differentiator between PCG and any other vendor is the fact that PCG can guarantee success based on our track record implementing AVS on behalf of 30 states around the country. This will ensure a timely implementation, uninterrupted service, and will eliminate all of the risk associated with adopting a new system from an unknown vendor with limited Medicaid AVS experience.

While risks are limited, PCG understands that anytime an agency is implementing a new system, there are risks. Preliminarily, PCG believes the following risk exists:

ID	Risk	Description	Mitigation Steps	Significance
R-001	External agency readiness, availability, participation, and execution	Because PRMP is asking respondents to integrate with four other Puerto Rican agencies to obtain additional data, their level of cooperation is critical during this implementation.	Plan ahead by alerting these agencies to the forthcoming implementations and work with these agencies to assign resources to execute these implementations.	High
R-002	Disruptive weather	Hurricanes and/or other disruptive weather could impact project personnel, systems, and web access	Plan extra time in the implementation plan to ensure any unexpected delays do not impact the overall timeline of the implementation	High

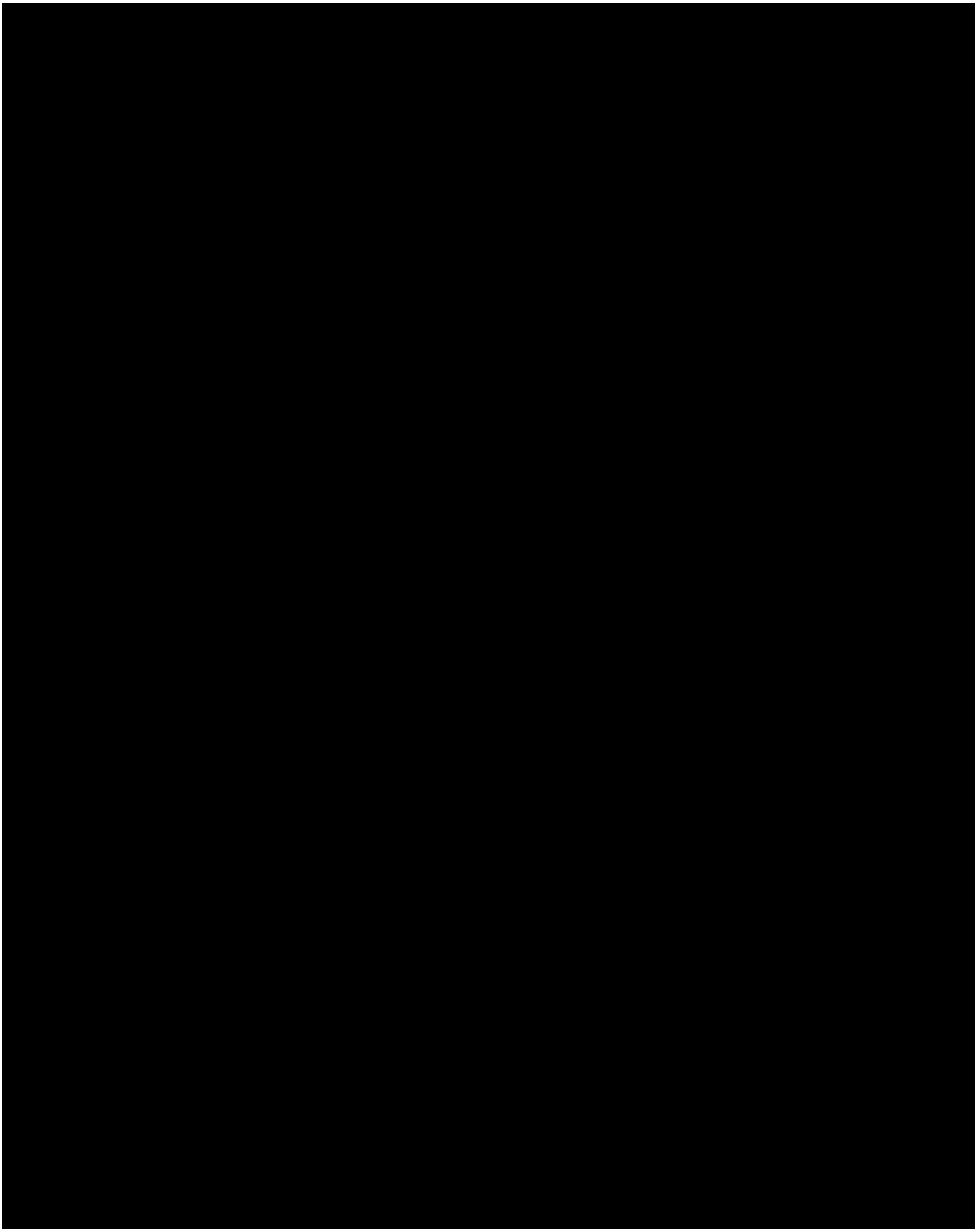
ID	Risk	Description	Mitigation Steps	Significance
R-003	Subcontract Agreements	Delays in subcontracting agreements could slow implementation.	ASAP coordination with subcontractors to complete paperwork.	Medium
R-003	UAT Defects	Any production blocking issues found in UAT could delay go live.	Internal End to End testing and pre-defined UAT test criteria.	High
R-004	Configuration Input	Delays in providing necessary configuration input may impact delivery timelines.	PCG will work with PRMP in the collection of the necessary program/policy information to establish the checks (configuration).	Medium

Figure 63.0: Initial key project risks.

4. Describe how the system will be monitored for performance, reliability, and security.

PCG leverages the AWS CloudWatch solution to monitor the performance of our AVS twenty-four (24) hours per day, seven (7) days per week and alerts PCG in real-time to any degradation of performance. PCG supplements this solution with proprietary monitoring tools which evaluate and report on system performance and availability every fifteen (15) to sixty (60) seconds, twenty-four (24) hours per day, seven (7) days per week. This solution monitors interface and server availability, usage, performance, and latency to detect any anomalous scenarios representing a potential issue in availability or performance.

The combination of each of these factors supports our ability to ensure our AVS is available twenty-four (24) hours per day, seven (7) days per week, regardless of the volume of AVS requests being submitted at any given time.



PCG's proven experience, combined with our AWS and proprietary system monitoring tools, will ensure we will always be able to instantly respond to any system issues.

5. Describe the procedures for regular maintenance and updates.

PCG employs a number of internally developed and native AWS tools to ensure constant uptime. PCG employs off-hours maintenance scheduling and AWS Lambda task management systems to trigger the execution of after-hours tasks. AWS managed services ensure system availability, while eliminating the need for system downtime for updates and/or maintenance and ensuring regular security patching, certificate updates, and more.

In the unlikely event that maintenance becomes necessary, PCG agrees to notify PRMP a minimum of seven days in advance of a planned outage and to perform this maintenance after hours to prevent it from impacting our system's availability.

6. Provide plan for training users on system operation and troubleshooting.

PCG will work with PRMP to define your training needs and coordinate the scheduling and execution of these trainings. PCG's training typically includes materials, such as user guides, training presentations, frequently asked questions, virtual trainings, Web-based trainings, and instructor-led trainings. PCG will finalize training needs and requirements with PRMP during the requirements definition phase of this engagement.

Specifically, PCG's Training Plan will address each of the following key training considerations:

Plan Component	Description
Location and Tools	PCG will collaborate with PRMP to determine whether trainings should be facilitated through PCG's existing Learning Management System (LMS) and/or via another approach, including whether any in-person training is required.
Methodology	PCG will collaborate with PRMP to define the methodology for training, including determining whether PCG will rely on automated, Web-based, interactive trainings and/or will employ a hybrid training approach that includes activities outside of the LMS.
Roles and Responsibilities	PCG will collaborate with PRMP to define our role in the training process, including identifying who will be reponsibile for training communications and scheduling. PCG will identify each training stakeholder, including any agency contractors, and their specific roles and responsibilities in the training process.
Training Objectives and Courses	PCG will collaborate with PRMP to define your training goals and which training topics are required, including FCRA, user access and roles, new data sources, and more.
Training Times and Review Timelines	PCG will finalize the training materials review process for the development of all training materials and corresponding documentation. PCG will define this approach within our Training Plan. PCG will also define the estimated amount of time needed for each training course.
Training Update Protocols	PCG will collaborate with PRMP to define the protocols for updating training materials, including any updates required as a result of a system release/change.
Training Support	PCG will define technical and non-technical training support options and contact methods.
Training Artifacts	PCG will catalogue all training documents, materials, sites, and equipment used on the training process. PCG anticipates storing

Plan Component	Description
	these artifacts within our Asset Verification Program project SharePoint site, which will be accessible to PRMP throughout the engagement. Additionally, PCG will provide PRMP with a user guide to support and inform training and production activities.
Training Testing and Compliance	PCG will collaborate with PRMP to define the requirements for testing and certifying training materials, preparing training locations (including virtual locations), recording, and ensuring ADA-compliance.
Checklists and FAQs	PCG will collaborate with PRMP to define training instructor checklists, develop frequently asked questions documentation, and any post-training activities.
Training Access	PCG will define how trainees will access PCG trainings, including how to access PCG's training environment.

Figure 65.0: PCG will work with PRMP to define and execute any needed user training.

Live, virtual trainings will be composed of a "classroom training", during which we will introduce our AVS and provide instructions on how to submit requests, access results, navigate and interpret these results, and use results to support client follow-up activities. We also offer additional guidance, including training materials, user guides, and videos of prior web-based trainings, as needed. PCG also agrees to provide ad-hoc training to PRMP users upon request, either via "train the trainers" trainings or through direct user trainings.

Also, on behalf of several other PCG HHS agency asset and eligibility verification clients, PCG designed and deployed a web-based Learning Management System (LMS) for agency workers requiring training. PCG developed web-based training, including automated quizzes after each section of the training, as well as web-based final exams.

PCG can leverage this LMS as directed by PRMP to facilitate and track user trainings. Using an LMS to facilitate training on system updates, enhancements, and modifications will also allow your workers to take the training at their convenience.

Users will be able to access the specific training course which are required for their group and will be prompted as a new user or existing user to complete trainings according to PRMP requirements.

7. Include ongoing support mechanisms.

Leveraging three decades of call center operations and customer support experience, as well as industry-leading telephone and CRM technologies, PCG offers the following support options, the combination of which ensure PRMP and your employees are supported with transparent and timely services throughout this engagement, including:

Support Type	Description
High-Priority Technical Support	PCG's technical leadership team, led by our Technical Manager, Naresh Kommineni, will be available to PRMP for the duration of this engagement. Additionally, all PCG project team members will be available to PRMP to receive requests for technical support throughout this engagement. All reported technical support issues are logged within PCG's Team Foundation Server (TFS) and tracked and reported on until resolution. Finally, PCG's core AVS technical team has been together since 2016, ensuring PCG is able to rapidly deliver resolutions to any unforeseen technical issues.

Support Type	Description
AVS Help Desk	Additionally, PCG offers live technical support available via a dedicated phone number, fax, and a help email inbox. All reported technical issues are tracked within PCG's TFS issue resolution software. PCG offers a dedicated support email address and phone number to allow PRMP workers to report system and data errors. PCG technical support professionals can coordinate with call center staff, as necessary, to ensure timely and satisfactory resolutions to worker issues and/or concerns. PCG's help desk will be available, at minimum, during all PRMP business hours, including overtime hours.
Consumer Dispute Resolution/FCRA Support	PCG's proposed solution fully complies with the Fair Credit Reporting Act (FCRA). PCG maintains a consumer dispute resolution help desk, which allows PRMP clients to dispute information provided by any of our FCRA data sources. PCG understands and complies with each public assistance clients' right to obtain their data file and right to dispute any inaccurate information. PCG provides dispute intake, dispute documentation, dispute communication with third-party data providers, and dispute resolution solutions, which are accessible to your public assistance clients.
Project Management Support	PCG's Project Director, Project Manager, and Associate Project Manager are available via phone and email at any time should PRMP management have questions or concerns. Our staff will also be available for in-person consultations at any time with reasonable notice.
FI Help Desk	PCG will provide live support to financial institutions either enrolled in or being recruited for your AVS program. This support will be available via phone and email during normal business hours. PCG financial institution support professionals can coordinate with PRMP call center staff, as necessary, to ensure timely and satisfactory resolutions to worker issues and/or concerns.

Figure 66.0: Help desk program support functions. Our help desk will offer PRMP technical and project management support throughout the duration of the engagement.

With extensive experience in managing and operating call centers in several states across the country for more than 30 years, PCG can immediately staff this project with experienced help desk specialists. PCG will always work with PRMP to establish reasonable resolution timeframes, and we agree to be subject to negotiated financial penalties in the event we cannot meet the reasonable, target resolution timeframes.

8. Outline procedures for data storage, backup, and protection to ensure compliance with federal and state regulations and safeguard against unauthorized access.

All AVS requests and results are copied upon receipt and prior to sending, respectively. Further, PCG utilizes AWS's infrastructure to backup and store all project data for as many additional years as the State requires. AWS allows PCG to log, monitor, and retain storage API and ETL call activities for auditing, copies data across a minimum of three AWS facilities, supports three forms of encryption, and adheres to security standards and certifications, including SEC Rule 17a-4, PCI-DSS, HIPAA/HITECH, FedRAMP, EU Data Protection Directive, FISMA, FIPS 140-2, and more. Additionally, the AWS CloudTrail product logs, continuously monitors, and retains all account activity and actions across PCG's cloud-based data warehouse. CloudTrail maintains event history of all actions taken and analyzes these actions to support troubleshooting, compliance assurance, and operational auditing.

PCG leverages the AWS Elastic Block Store (Amazon EBS) to provide persistent block level storage volumes for use with our EC2 instance in the AWS Cloud. Each Amazon EBS volume is automatically replicated within its Availability Zone to protect from component failure, offering high availability and durability. PCG archives our databases per the following schedule:

1. Two active copies of the production database always (Ohio and N Virginia AWS Regions)

2. They are imaged hourly for 48 hours (we have 48 copies to roll back to)
3. Each daily image is archived for 30 days
4. Each weekly image is archived for 12 weeks
5. Each monthly image is archived for 52 weeks
6. Each quarterly image is archived for 3 years
7. Each yearly image is archived for perpetually

PCG has also developed an enterprise-wide data destruction program that allows for consistent, secure disposal of data throughout all of our company. This program includes both destruction of hard and soft copies of data. Every PCG office has at least one, if not more, secure shredding bin that is processed by a SOC2-certified vendor to ensure secure disposal of any confidential data that has been printed from PCG systems or for PCG. Soft copies (data on electronic devices) are handled in two different ways, depending on whether the device is to be re-used or not. If the device is to be re-used within PCG, it is fully sanitized and wiped (using DoD 5220.22-M standards) to ensure no data is remaining when it moves on to its secondary use. If a device is to be destroyed, it is sent for secure disposal and destruction with a SOC2-certified company that provides a certification of destruction for each and every device, as stated in PCG's media sanitization policy and standards.

PCG can transition to a backup of our AVS in minutes in the unlikely event of a catastrophic outage.

9. Include a communication plan, establish the communication channels and protocols for internal and external stakeholders. Include escalation procedures for addressing issues and concerns.

PCG understands that consistent two-way communication is critical to the success of any Data Broker Services project. At the outset of this engagement, PCG will coordinate with the State's team to establish a formal Communication Plan and Governance Structure.

PCG's Communication Plan and Governance Structure will identify each internal and external project stakeholder, what they need to know, and when they need to know it. This plan will also define our communications and meeting schedule, assign responsibilities for communications, and identify each stakeholder's preferred means of receiving communications from PCG. Finally, PCG will define the State's reporting requirements, the content of each report, and the timing of the report delivery.

The goals of PCG's approach to communications include:

- To promote project understanding, cooperation, participation, comprehension, and acceptance through timely and consistent two-way communications.
- To establish standards and protocols for communicating, including the method of communication, recipients, templates, and frequency of these communications.
- To identify project stakeholders, their preferred communications method, and to define which communications each stakeholder should be included on.

By achieving these goals, PCG will ensure HHSC is appropriately informed throughout this engagement, while allowing HHSC to effectively monitor PCG's performance and activities throughout.

On the following pages, PCG has defined our preliminary approach to communications. PCG agrees to update this plan, as needed, to accommodate any additional Puerto Rico needs or requirements.

Communications Process

Plan Communications

The underlying key to a communication management system is the effective planning of communication-related activities. This section further describes those activities.

Stakeholder Identification

As the first step in planning communications, stakeholders must be identified, and relevant information about those stakeholders must be recorded. A project-level stakeholder registry will be developed and can serve as a model and starting point for Project Managers to determine appropriate audience for communications. All stakeholder registries are subject to review and approval by the PRMP Project Manager.

The following tasks will be performed to identify stakeholders:

- Gather documentation such as meeting schedules, organization charts, email lists, and contact information.
- Meet with PRMP Project Managers to identify and confirm stakeholder information.
    - Acquire a list of team members, including vendors, with roles, official titles, and email addresses.
    - Acquire a list of external and internal stakeholders; these may be by group name.
    - Determine potential beneficiaries.
    - Determine who may be adversely impacted.
    - Identify vulnerable groups.
    - Identify supporters and opponents.

The stakeholder registry will be delivered to PRMP upon completion and as updates are made.

Stakeholder Analysis

Once stakeholders are identified, an analysis will take place to determine the appropriate communication approach to be used. An initial project-level stakeholder analysis will be performed, resulting in the development of a project stakeholder registry. The stakeholder registry is subject to review and approval by PRMP Project Management.

The following steps will be used to conduct the stakeholder analysis:

- Meet with PRMP Project Managers to gauge and sort stakeholder interests and potential impact by considering the following:

- What are the stakeholder expectations?
- What are the likely benefits for the stakeholders?
- What resources may be mobilized by stakeholders?
- What are the stakeholder interests that may conflict with PRMP DB Project goals?
- What are the relationships among stakeholders?

- Analyze and outline a stakeholder participation strategy, according to:
  - Specific needs.
  - Appropriate forms of participation throughout the project life cycle.

The stakeholder registry includes the following information:

- First Name
- Last Name
- Title/Role
- Contact Information
- Specific Focus Area

Manage Communications

During this stage of the process, Project Managers are tasked with the following:

- Collecting and analyzing information, including any from external sources. The Project Manager ensures that information such as accomplishments, issues, and risks are collected from various sources and analyzed, as needed.
- Compiling information. The information is compiled into reports, presentations, or other forms of communication delivery.
- Disseminating information. Through various methods of communication, information is disseminated to the appropriate stakeholders per the communication matrix.

Status Reporting Process

Status reporting is an exercise undertaken by the PCG AVS project team as we plan and implement projects. The goal is to monitor project activities including milestone tracking, recent accomplishments, issues, and risks.

Official Communication

Any official communication that requires an audit trail, such as milestone approvals, decisions, change orders, or deliverables, will need to be delivered to the PCG Project Manager. This allows the Project Manager and other stakeholders to maintain an audit trail of the correspondence. Other stakeholders should be cc'd on the communication to ensure timely dissemination of the information.

Measurements and Metrics

Upon completion of the status reports and on predefined status dates, the PCG Project Manager will send, via email, the weekly and monthly status reports to keep all stakeholders updated on the project's progress.

Communication Approval

Project communication should be free-flowing and ongoing; however, certain communications may need approval before they can be released. Any internal communications directed to PRMP executive leadership will need approval. The approval steps are as follows:

- The PCG Project Manager will review and obtain approval from the PRMP Project Managers.
- The PRMP Project Managers will review and give approval and distribute communication.

All external communications must adhere to PRMP policy. Any questions about external communications should be directed to the PRMP Project Manager for further guidance.

Storing and Maintaining Communications

PRMP AVS project communications are maintained in real time and applicable communication and documentation are stored. Standardization is a way to simplify the complexities of project communications. By adhering to communication standards, the PRMP AVS project and associated projects can help ensure that its project teams and stakeholders have a thorough understanding of what is expected and achieve consistent and effective communications.

For all formal communications, which will be distributed according to the stakeholder matrix supplied by the PRMP AVS project team, PRMP AVS standard formats and templates will be utilized. Formal communications include the following:

- Kickoff meetings
- Weekly Status Meetings
- Monthly Project Reports

Informal project communications should be professional and effective, but there is no standard template or format that must be used.

Meeting Guidelines

The following guidelines should be followed when conducting project meetings:

- **Meeting Purpose** – Clearly define and communicate via agenda or meeting request, the purpose and objectives of the meeting. Doing so will help ensure participants are aligned toward a common goal.
- **Meeting Agendas** – Distributed in advance of the meeting. The agenda should identify the presenter for each topic along with a time limit for that topic. The first agenda item should be a review of action items from the previous meeting, if applicable.
- **Meeting Minutes** – Distributed within one business day following the meeting. Meeting minutes will include the status of all items from the agenda along with new action items and decisions.

- **Action Items** – Recorded in both the meeting agenda and minutes. Action items will include the action item along with the name of its owner and a due date. Meetings will start with a review of the status of all action items from previous meetings and end with a review of all new action items resulting from the meeting. All action items documented in meeting minutes will be logged for monitoring. The Project Manager will send periodic reminders to owners to facilitate their completion.
- **Meeting Facilitator** – Responsible for distributing the meeting agenda, facilitating the meeting, and distributing the meeting minutes. The facilitator will ensure that the meeting starts and ends on time and that all presenters adhere to their allocated time frames.
- **Meeting Equipment/Tools** – Presentation and conference call equipment should be secured for use in meeting rooms. This includes scheduling web meeting and/or conference line tools for off-site participants. All equipment and tools should be in operation and ready to use prior to the meeting start time whenever possible.
- **Meeting Scribe** – Responsible for documenting the status of all meeting items, maintaining a parking lot list, and taking notes of anything else of importance during the meeting. The scribe will give a copy of the notes to the facilitator at the end of the meeting to use in creating the meeting minutes.
- **Parking Lot** – Used to record and defer items that aren't on the meeting agenda but that merit further discussion later or through another forum. A parking lot entry should identify each list item's owner, as that person will be responsible for ensuring follow-up. The parking pot list is to be included in the meeting minutes.

Meeting Schedule and Purpose

Regularly scheduled meeting will be held and attended as follows:

- **Monthly Status Meetings –** To be held monthly in-person or virtually to provide direction and define decision-making procedures and to create a forum for timely issue resolution.
- **Weekly Transition Phase Status –** To be held virtually to address any concerns or issues with project implementation, data tracking and reporting, and other technical assistance issues.
- **Weekly Status Meeting –** To be held virtually to discuss the progress, challenges encountered, strategies used to address those challenges, and other topics relevant to ensuring a successful project.

Monitor Communications

The PCG Project Manager and project team members should monitor whether the information needs of the project and its stakeholders are met and whether communication remains effective. This process includes assessing the use of templates and processes and reporting communication status. Relevant questions to be asked as a part of monitoring activities include:

- Is the information that is communicated useful, timely, and relevant?
- Is the information provided with the right level of detail?
- Does the information cover all topics that team members and stakeholders require?
- Should new communications be added, or additional media incorporated?
- Should the communication target different or additional groups?
- Do the format, contents, level of detail, and method of delivery meet the requirements of the stakeholders and facilitate understanding and acceptance?

Feedback Collection

Gathering feedback on the communication process is important to verify that communications are received and that key messages are understood. The feedback is helpful in assessing various stakeholder groups' progress toward understanding and committing to PRMP AVS project goals. The PCG Project Manager will solicit feedback

on a regular basis regarding communication effectiveness to evaluate which methods being used are most effective for the audiences.

Collecting feedback is important to the success of the PRMP AVS project in that it:

- Provides an opportunity for stakeholders to remain actively engaged in the process.
- Measures the communication efforts' effectiveness in reaching target audiences.
- Gauges each stakeholder's readiness and capacity for change.

The PCG Project Manager will seek feedback via discussions with the PRMP Project Manager and/or their delegates.

Feedback Analysis

The feedback collected will be analyzed to provide a comprehensive picture of communication effectiveness. The analysis will be shared, as appropriate, with the project teams to identify "lessons learned" to plan future communication efforts.

As new stakeholders are identified or information needs for existing stakeholders change, the supporting communication tools (communication registry, etc.) must be updated and revised to reflect the changing environment.

Roles and Responsibilities

The table below outlines the key roles and responsibilities for the processes defined in this plan.

Roles	Responsibilities
Project Team Members and Stakeholders	• Read PRMP AVS project communications; seek clarity for items not understood. • Actively participate in meetings and sessions. • Utilize templates and supporting documents relevant to each respective project. • Follow best practices for written and oral communication, including communicating clearly and reviewing communications before sending. • Develop communications in a format that is efficient, understandable, and easily accessible. • Identify and communicate goals and expectations. Utilize situational leadership to inform, influence, and direct as appropriate.
Project Managers	• Identify project changes and the impacted stakeholders (stakeholder analysis). • Promptly provide PRMP AVS project communications to downstream resources and stakeholders. • Facilitate access to PRMP AVS project information by team members. • Proactively address misunderstandings or miscommunications. • Facilitate and oversee the update of any impacted project documentation accordingly. • Confirm that project documentation and deliverables are updated in a timely manner. • Fulfill all responsibilities listed for PRMP AVS project team members and stakeholders.

Figure 67.0: Communications Roles and Responsibilities.

Tools and Enablers

The PRMP AVS project will use a set of tools to capture, distribute, review, and analyze program/project information and create project-related reports. These tools include the following:

- Microsoft Teams – Microsoft Teams is a proprietary business communication platform developed by Microsoft, as part of the Microsoft 365 family of products. Teams offers workspace chat and videoconferencing, file storage, and application integration. Teams is also used by the PCG Project Manager and team as a document management and storage system (static data) for the project. It is a library and repository designed for storing data and facilitates the sharing and exchange of data documents and files among teams.
- Zoom Video Communications – Zoom is a proprietary video telephony software program developed by Zoom Video Communications.

Governance and Escalation

As it relates to the Communication Management Process, items that could require further approval and direction through the proper governance channels are scope, contract updates, or approvals.

The PCG Project Manager and team will strive to resolve issues and make decisions at the lowest governance level, minimizing the need for a higher level of approval.

If communication conflicts arise during the implementation or operations phase of the PRMP AVS project, the Project Manager will work with the appropriate parties to resolve the issues, soliciting guidance from the PRMP Project Manager as needed.

10. Detail procedures for ensuring the accuracy, reliability, and integrity of the data that is processed by the system.

The accuracy, reliability, and integrity of the data that is processed by PCG's AVS is ensured through a series of validation edits and checks. All requests and responses must meet the minimum acceptance in data fields presented, and values within those fields. For each required field, PCG will confirm to be present. Additionally, the data within these fields is validated for format and values when possible. If there are any anomalies in the received transaction responses, it will be rejected with all applicable error codes as to the problem with the transaction. This will result in a new response being generated and subsequently returned to PRMP.

D. Turnover Phase Plan

The Turnover Plan must include the following:

Proposed approach to turnover

Tasks and subtasks for turnover

Schedule for turnover

Detailed chart illustrating the Vendor's total operation.

Transfer of PRMP documents.

Turnover Results Reports.

The Vendor must provide the Turnover Plan within the specified date and time.

PCG understands that it is critical that Puerto Rico can smoothly transition from one AVS vendor to another should it be necessary. PCG is committed to adequately documenting all processes, as well as all business, functional, and technical requirements, to ensure the continuity of operations in the event of a change in vendor.

PCG will take necessary steps to:

- Document and maintain copies of all relevant data and reference tables, documentation, and other pertinent information necessary to take over and successfully assume operational activities, including all works in progress, and to provide this to PRMP upon request.
- Provide current inventories, correspondence, documentation of outstanding issues, and other operations support documentation to PRMP upon request.
- Transfer all written and electronic documentation, including work in progress pertaining to the business processes including but not limited to: work instructions, work process flows, system user instructions, process memos, plans, and any other materials used in the business process.
- Create and maintain documentation describing all relevant information regarding the data sources used within the verification service.
- Transfer all training materials in electronic format including but not limited to the training plan, training curriculum, training materials, and any in-progress training content.
- Completely transfer all of the above to PRMP and/or another entity, upon request.

Turnover Artifacts

PCG is committed to compiling, maintaining, and transferring all documentation and artifacts necessary to inform an incumbent vendor and allow them to expeditiously establish high-quality integrated state verification system services. PCG will electronically store all project requirements, documentation, and artifacts within the forthcoming SharePoint site, to be maintained by PCG and accessible to PRMP at all times. As requirements change and/or evolve, PCG will update project artifacts stored within this site. This SharePoint and ongoing document revisioning will ensure ongoing, transparent agency access to project artifacts and will allow for appropriate version control, respectively.

Data Definition Artifacts

PCG will document and maintain the following artifacts and information for each data source being accessed by our verification service, unless prevented from doing so by third-party commercial data vendors, and for each process being generated by our asset verification service.

- Process name
- Data source(s)
- Technical requirements
- Sample file(s)
- Transmission protocol(s)
- Data source contact information
- Testing contact information
- Development contact information
- Encryption type and corresponding keys
- Connectivity requirements
- Implementation user stories, test scripts, and acceptance criteria
- Number of files, if applicable
- Specifications, WSDLs, and/or schema
- File transmission frequency, if applicable
- Full or incremental transmission indicator, if applicable
- Producer and processer of file indicator, if applicable
- Historical data (including but not limited to case history and data source history)
- Work in progress data, documentation, and requirements.

Reports Definition Artifacts

PCG will document and maintain the following artifacts and information for each report being accessed and/or generated as part of this engagement:

- Sample report (including ad-hoc reports)
- Report generation requirements

- List of report data elements and mapping of report data elements with element data source(s)
- Implementation user stories, test scripts, and acceptance criteria
- Work in progress data, documentation, and requirements

Operations Artifacts

PCG will document and maintain the following artifacts and information related to AVS operations:

- User guide(s)
- Training curriculum and materials
- Final knowledge transfer plan
- Post-turnover results report
- Operational protocols (i.e. any documented business processes instructing PCG staff operations)

Project Management Artifacts

PCG will document and maintain the following AVS project management artifacts:

- All project management reports
- All project deliverables
- Acceptance testing plan
- Data dictionary

Turnover Plan Components

PCG's turnover plan will include the physical, electronic and informal transfer of information to PRMP and/or the incumbent, as follows:

- **Physical Knowledge Transfer**: PCG will transfer historical data, per our contract's requirements, via an encrypted hard drive by delivering this in-person to PRMPs authorized designee.

- **Electronic Knowledge Transfer**: PCG will transfer the remaining artifacts to PRMP and/or the incumbent electronically via a secure-FTP site hosted by either PRMP or the incumbent.
- **Informal Knowledge Transfer**: PCG will make key project staff available throughout the transition process to support the incumbent and/or PRMP in locating additional information, performing staff training on-site at PRMP, and/or answering any questions either electronically, in-person at PRMP, and/or over the phone.

Turnover Staffing

PCG will support PRMP's transition to the incumbent vendor with the following key project staff:

- **Project Manager:** PCG's AVS Project Manager will be responsible for interfacing with PRMP and the incumbent and ensuring all turnover activities are tracked and completed. PCG's Project Manager will also coordinate the availability of additional project staff, as necessary, including technical, training, and executive staff.
- **Technical Manager:** PCG's AVS Technical Manager will serve as the technical lead and work with PRMP and/or the incumbent's technical team to ensure the successful transfer and interpretation of all turnover artifacts. PCG's Technical Manager will also ensure additional technical staff are available upon request.
- **Training Manager:** PCG's AVS Training Manager will work with PRMP and/or the incumbent to transfer training artifacts and information.
- **Additional Staff:** PCG will make available additional project staff and management as requested by PRMP for six months prior to any planned turnover to another vendor.

PCG agrees to provide a form Data Transmission Plan (DTP) at least ninety days prior to the end of the contract or unless otherwise specified by PRMP.

Turnover Schedule

Because PCG commits to storing and organizing the majority of the project turnover artifacts described above within our project SharePoint site, obtaining access to this information will be an efficient, seamless exercise for Puerto Rico and any new AVS vendor.

What follows is the anticipated turnover schedule. PCG agrees to modify this schedule for PRMP, upon request.

Date	Activity	Description
30 days after contract award	Data Transmission Plan	PCG will submit our Data Transmission deliverable.
90 days prior to contract expiration	Turnover Artifacts Upload	PCG will have all turnover artifacts detailed in the above sections uploaded to our project SharePoint site, allowing for ongoing and real-time State access throughout the remainder of the contract.
90 days prior to contract expiration	Inventory Reporting	PCG will submit a catalog to PRMP detailing all turnover artifacts and where in the project SharePoint site they are being stored.
90 days prior to contract expiration	Artifact Collection	PCG will download all turnover artifacts from our project SharePoint site.
Day 30 After New Vendor Selection	Electronic Knowledge Transfer	PCG will transfer all artifacts, including work in progress but except historical data, to PRMP via secure FTP.
Day 30 After New Vendor Selection	Informal Knowledge Transfer	PCG will make key project staff available throughout the transition process to support the incumbent and/or the agency in locating additional information, performing incumbent staff training on-site at PRMP, and/or

Date	Activity	Description
		answering any questions either electronically, in-person at PRMP, and/or over the phone.
Day 30after Vendor Transition	Turnover Results Report	PCG will submit a turnover results report detailing the results of PCG's turnover and knowledge transfer activities.

Figure 68.0: PCG understands how difficult it is to successfully transition from an existing vendor to a new vendor—because we have been that new vendor countless times—and PCG therefore understands how critical it is to organize all transition artifacts throughout the life of a project, rather than waiting until the last minute.

What follows is a detailed chart illustrating our system:

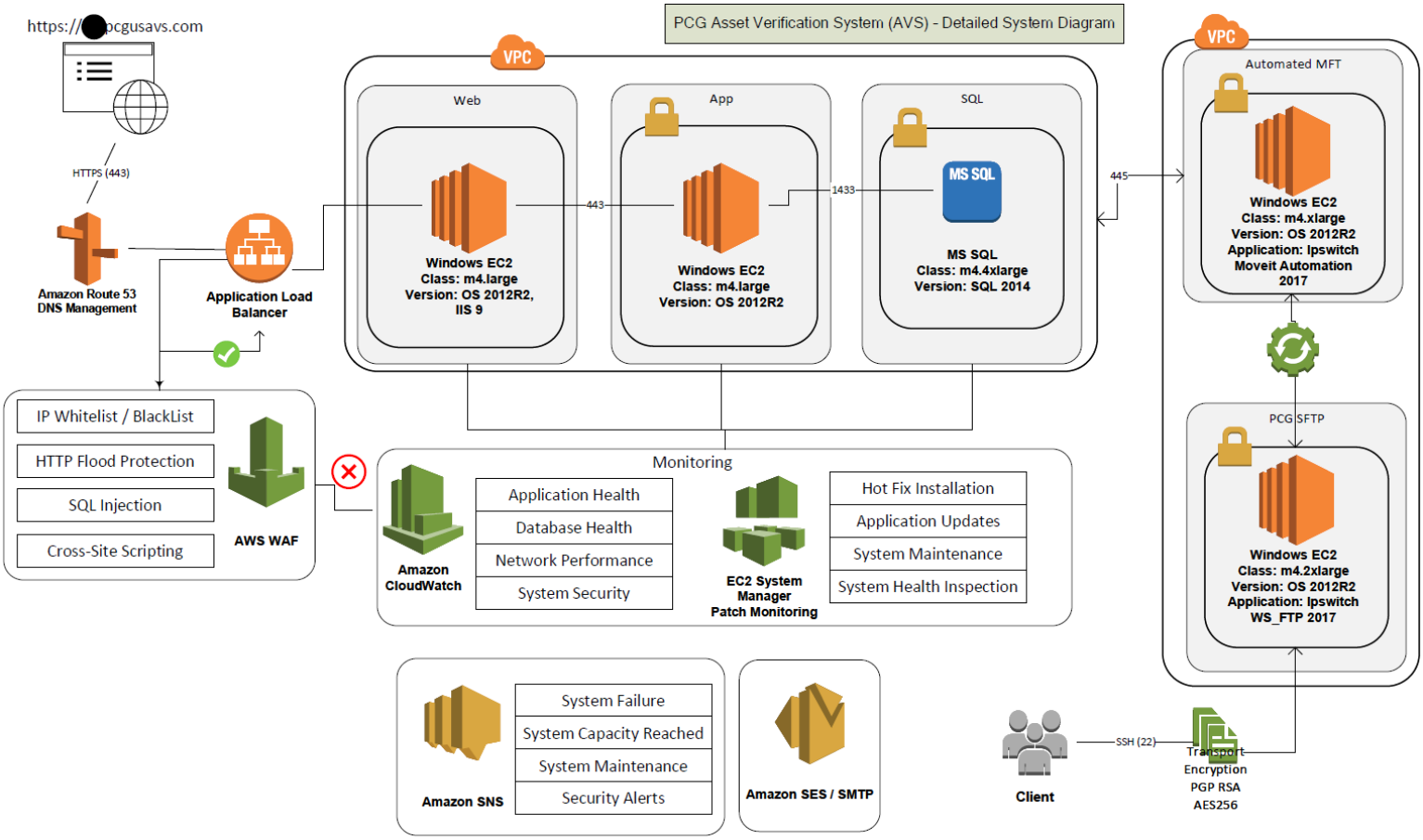


Figure 69.0: Detailed system diagram.

E. Reports

The AVS must meet the requirements of the Centers for Medicare and Medicaid Services (CMS) in the sending and receiving of inquiries and verifications. Monthly documentary reports would provide, but not limited to, the following:

Weekly summary of requests, responses and amounts (disclosed and undisclosed). Identified by institution and by applicant.

Monthly summary of data collected for each applicant from all respondents.

Response rate analysis by institution.

Report of period of ineligibility based on asset verification results.

Ad hoc reports as requested by PRMP.

The format of the reports will be discussed with the winning Vendor.

PCG's seasoned project managers understand the importance of ensuring our agency clients have the tools needed to easily track and monitor asset verification activities, users, and results throughout any engagement. PCG accomplishes this via each of the following tools, as described in the next section:

- Weekly Implementation Reports
- Monthly Performance Reports
- Ad hoc reports, as requested
- AVS Reporting Dashboard
- Communications Management Plan

Weekly Implementation Report

PCG's Project Manager and Associate Project Manager will lead weekly (at least) project status meetings during the implementation phase of this engagement and will be responsible for mapping PCG's actual activities and progress to our planned activities as defined in our work breakdown structure (WBS), reporting on the status of all implementation activities, highlighting any known or new potential risk and the corresponding mitigation strategies for addressing the risk, and reporting on planned next steps and sprint activities.

All of these topics will be formally memorialized via our Weekly Implementation Report, which we will deliver to PRMP by close of business on the Monday following each week. This report will include each of the following sections and topics:

Weekly Implementation Report	
Current Project Activities	This section will highlight all user stories which were initiated, worked on, and/or completed during the prior week.
Defects	This section will detail any new or outstanding defects, as well as their current statuses, assignees, and anticipated resolution dates.
Agency Interactions	This section will summarize all agency meetings and/or calls which took place the prior week, including a summary of the agenda and any notable outcomes and/or decisions.
Project Risk	This section will detail any know or potential risks, including a description of the risk, mitigation steps, and a contingency plan.
Project Issues	This section will detail any project issues, including a description of the issue, the root cause, and planned corrective actions.
Next Steps	This section will detail all activities and user stories which are expected to be addressed during the upcoming week.

Figure 70.0: Weekly Implementation Report

PCG will customize this report further to capture any other PRMP needs, upon request.

Monthly Performance Report

We will not only submit weekly implementation reports, but we will also submit a Monthly Performance Report to the State by the 10th day of the following month. PCG's monthly report will include the following report criteria, at minimum, and PCG agrees to supplement this report with any additional details PRMP requests.

Monthly Performance Report	
Transaction Report	This section will detail the number of transactions by data source, number of responses, and response timing of each response by data source.

Monthly Performance Report	
Financial Institution Response Rate Report	This section will include an analysis of financial institution responses, including the number of requests, number of responses, average response time associated with each financial institution, accounts found, undisclosed accounts found, results from any analytics being employed, and more.
Usage Report	This section will detail usage of PCG's asset verification service, including by region, county, user, and program.
Project Management Report	This report will map the status of all PCG activities to milestones and completion dates from our project management plan to allow PRMP to monitor our progress each month (this information will also be available in real-time through the project SharePoint site).
Corrective Action Report	This section will detail any outstanding inquiries more than 25 days old and the corrective actions take to address this with FIs.
Risk Report	This section will catalogue all identified risks, mitigation strategies and activities, contingency plans, and the current status of each.
Performance Report	This section will detail any system outages and/or incidents, including when and how it was discovered, the time until it was reported to Tennessee, any system and operational impacts, and corrective measures to detect and prevent future outages and incidents.
Issues Log	This report will detail all help and support activities, including the length of time from reporting to resolution, the status of all outstanding resolutions, and metrics on availability, response times, call and e-mail volumes, and more.
Discrepancy Log	This report will detail all pending discrepancies where PRMP identified AVS results which contradict physical statements.
Transaction Detail	This report will include all transaction details, including the request and response information associated with each request ID.

Monthly Performance Report	
Performance Standard Compliance	This report will measure PCG's compliance with PRMP's performance standards, both over the life of the project and during the prior month.
Aging Summary	This report will summarize the status of all outstanding inquiries, including the number of days outstanding.

Figure 71.0: PCG's Monthly Performance Report is designed to give PRMP all of the information you need to evaluate PCG and report out on metrics that are important to the agency.

Ad-Hoc Reporting

PCG also agrees to provide weekly or bi-weekly status reports, including any requested metrics and/or information, upon request. Finally, PCG also agrees to create and submit any ad-hoc reports and/or additional reports – including any urgently needed reports – requested by PRMP for the duration of this engagement. PCG will generate reports upon request and will provide these reports in the format of your choosing. PCG can modify our approach to reporting to include any additional data elements we maintain within our asset verification data warehouse to suit PRMP's needs.

Intellectual Property and Licensing

For purposes of clarity, PCG's pre-existing intellectual property, proprietary processes used for asset identification, and our AVS Web Portal do not qualify as work product as set forth in Section 3.13.3 of the RFP and PCG shall retain all in such proprietary processes.

Because this is preexisting PCG intellectual property, PCG also cannot license this system nor have it licensed back to us, as PCG retains and will continue to retain ownership of this preexisting system, and all processes and functionality included therein.