



Streamlined Modular Certification Requires a New Approach

Introduction

The recent release of streamlined certification guidance from the Centers for Medicare and Medicaid Services (CMS) is a challenging complexity for many states. It is essential to have an experienced partner to understand and navigate these new guidelines. Public Knowledge® is experienced with streamlined modular certification (SMC) and has already assisted several states in attaining system certifications, and we can do the same for you.

Background

The streamlined modular certification guidance released this year was accompanied by the release of the Medicaid Enterprise Systems (MES) Testing Guidance Framework. The SMC guidance incorporates certification-related processes into the system lifecycle, adding new requirements in the Planning, Development, and Production phases. It also integrates the Testing Guidance Framework, which documents expectations and recommendations for testing, into these phases.





Our Solution

Our consulting firm has the capability to support you in all stages of the certification process. We have subject matter experts to work with you and guide you through the entire process, from initial planning through final certification. Due to the comprehensive services we offer, Public Knowledge® is your one-stop shop for all new CMS requirements.

Planning

Our management consultants have decades of procurement knowledge and will help you successfully traverse how SMC impacts the Advanced Planning Document (APD) process by requiring outcomes and metrics to be included in the APD. The newly released CMS guidance also streamlines Medicaid Information Technology Architecture State Self-Assessments (MITA SS-As). Our firm's wealth of expertise will help navigate the new approach which replaces the maturity level ratings with a gap analysis between current limitations and the states' Medicaid program goals.

The MES Testing Guidance Framework contains several new requirements for test planning which Public Knowledge® has extensive experience assisting states with. The MES Testing Guidance Framework requires states to:

- Include requirements for testing the system in their contracts
- Share contracts with CMS and obtain prior approval to be eligible for Federal Financial Participation (FFP)
- Develop a Master Test Plan (how and what testing will occur)
- Develop and share an incident response handling plan / contingency plan (such as retaining legacy system)



Development

Public Knowledge® can assist in navigating the inclusion of the MES Testing Guidance Framework into the certification process. New requirements, such as the development of a Master Test Plan and requiring Organizational Change Management (OCM) as a part of the certification process, necessitates a reliable third party with this expertise. We offer a variety of services, including:

- Master Test Plan development
- Planning and execution of OCM programs
- Defect and Risk Reporting
- Status and Progress Reporting
- CMS Operational Readiness Review (ORR) planning
- System testing
- Independent system security audits

Public Knowledge® can help navigate the new MES Testing Guidance Framework requirements for test execution. The MES Testing Guidance Framework requires states to:

- Exercise their responsibility to test functionality
- Develop clear documentation of state and vendor responsibilities
- Develop processes to remedy defects
- Ensure the testing team includes experienced team members
- Provide CMS with test results from different types of tests
- Share testing and quality metrics with CMS
- Develop a thorough deployment plan
- Use and share collected data actionably, holding vendors accountable for unacceptable quality

Production

Public Knowledge® will help you confirm that you have a system that delivers the outcomes you've planned for. The SMC Guidance requires a new set of required artifacts as well as ongoing operational metrics reporting. The comprehensive capabilities and services we offer our clients help them to navigate all the processes and documentation required, including:

- CMS and Operational Reporting
- Risk Management
- CMS Certification Review (CR) planning

Public Knowledge® can assist states in adherence to the new MES Testing Guidance Framework expectations for operational monitoring, which are:

- Performing ongoing testing after the system is in production
- Sharing metrics used to monitor system health
- Using collected data in an actionable manner to hold vendors accountable



The PK Advantage

There are certain services you will only find at our consulting firm. In addition to our mastery of all services related to the new SMC guidance, we support our clients in innovative ways.

Independent Security Audits

As a GLI company, we have access to our sister company, [Bulletproof](#), and their comprehensive IT services which include independent system security and privacy assessments. As a requirement for ORR, Public Knowledge® can provide this additional service with a trusted partner, saving you valuable procurement effort and time.

Learning Services

Learning development is a diverse add-on to any service we offer to our clients. Specializing in custom content creation, we can build learning solutions to provide guidance and OCM programs to assist with the adoption and ongoing training of new systems and their new functions within the MES.

Conclusion

States still need help from consulting firms like Public Knowledge® to ensure they are meeting CMS' requirements. States are now able to engage with Public Knowledge® for planning, testing, OCM, and other services without restrictions previously placed on IV&V vendors. The new layer of complexities and deliverables makes working with a trusted partner essential. When you work with our firm, you can be confident knowing you are in the hands of experienced professionals.

Learn more at Pubknow.com.

