



PROPOSAL TO PROVIDE:

Consulting Services

FOR THE:

**Puerto Rico Department of Health
(PRDoH)**

BerryDunn

100 Middle Street, Portland, ME 04101
207-541-2244

William A. Richardson, Principal
brichardson@berrydunn.com

Proposal Submitted On:
March 6, 2020



March 6, 2020

Ms. Luz E. Cruz-Romero
Executive Director
Puerto Rico Medicaid Program

Sent via email to luz.cruz@salud.pr.gov

Dear Ms. Cruz-Romero:

Thank you for the opportunity to submit this response to the Puerto Rico Department of Health's (PRDoH's) invitation to support the Puerto Rico Medicaid Program (PRMP) with Congress' requirements compliance. We appreciate the opportunity to propose services that allow us to continue to partner with Puerto Rico in your efforts to comply with these Congressional regulations. BerryDunn understands the importance that you, as well as Secretary Rodriguez Mercado and the entire PRMP, place on the success of implementing these requirements and how their implementation impacts PRMP's future.

Berry Dunn McNeil & Parker, LLC (BerryDunn) is an independent national consulting and accounting firm with a dedicated Government Consulting Group and a deep commitment to helping Medicaid programs and the people you serve. Government consulting services are a core strength of our firm and the work we engage in every day. We have an extensive history of successfully assisting clients with similar initiatives and welcome the opportunity to assist you on this project.

Our approach is simple: **consistently produce high-quality services, strive for unparalleled client satisfaction, and deliver both at a reasonable cost.** You can feel confident selecting BerryDunn—we have the expertise on Centers for Medicare & Medicaid Services (CMS) rules and regulations, proven compliance methodology, and resources to lead this project and fulfill your objectives. Our team will bring this experience to Puerto Rico in support of PRMP's Congressional requirements compliance efforts. We are committed to sitting side-by-side with Puerto Rico, sharing our deep experience, and supporting you in your efforts to comply with Congress.

We will work with PRMP to integrate project teams and contribute in a manner that promotes a successful federal compliance outcome. Please consider the following strengths and benefits that BerryDunn offers:

- **Experienced partner.** We have experience partnering with Medicaid programs in order to help ensure federal compliance. PRMP will benefit from the experience BerryDunn brings to this project, gained through our work with more than 300 state, local, and quasi-governmental clients across the country—including **helping states navigate federal compliance for more than 25 years.**
- **Understanding Puerto Rico's environment and Medicaid program.** We have partnered with PRMP on key projects since 2019. Our experience working with PRMP

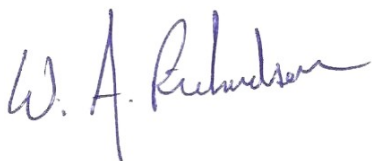
enables us to understand the Congressional requirements, policies, audits, and reporting structure that can be leveraged to make the PRMP fully compliant with CMS. We know your team and are familiar with your challenges, so we can quickly assist.

- **Available and engaged staff.** We have key members of the team ready to partner with PRMP and start the work based on the required timelines as soon as the contract is approved by CMS. These staff include our core team members—Ethan Wiley, Yoko McCarthy, Vanessa Cayer, and Christy Schilling. Our team will be able to easily add/incorporate this work; we already have to **Spanish-speaking team members** based in San Juan, who will help provide you with continuity across multiple projects.
- **Extensive CMS rules and regulations expertise.** Over the past 20 years, BerryDunn has supported Medicaid enterprise initiatives in **Puerto Rico**, as well as Arizona, Hawaii, Maine, Maryland, Massachusetts, Minnesota, Missouri, New Hampshire, New Mexico, Ohio, Vermont, Washington, and West Virginia. In addition, we will help PRMP develop good relationships with members of Congress and federal agencies through our work with State Medicaid Agency Health and Human Services (HHS) policy definition, advance planning documents (APDs) development, and certification and compliance assistance. We also have a record of working with CMS and have extensive expertise on CMS rules and regulations. This perspective together with knowledge of trends, contractor capabilities, and current CMS guidance related to Medicaid enterprise systems, positions us to be your consulting services partner.
- **Proven compliance and audit methodologies, tools, and templates** that are based on state and national rules and regulations and industry standards—including those of the American Institute of Certified Public Accountants, Generally Accepted Government Auditing Standards (GAGAS), the National Institute of Standards and Technology, the Committee on Sponsoring Organizations, and the Association of Certified Fraud Examiners.

BerryDunn will only charge PRMP for the hours used on the project efforts. Furthermore, we believe BerryDunn's existing Enterprise Objective Monitoring & Control Services (EOMC) contract provides PRMP with a unique opportunity to use existing or potential future support. We would be happy to discuss this further at PRMP's convenience.

BerryDunn is committed to providing Puerto Rico with excellent staff service, knowledge sharing, and the expertise to help you comply with federal requirements in and across the Medicaid Enterprise. We consider it a privilege to work with PRMP to help promote the success of the PRMP. Please contact me at 207-842-8023 or via email at brichardson@berrydunn.com for any questions or further discussion. Thank you for your consideration of our firm.

Sincerely,



William A. Richardson, PMP®, ITIL, Prosci® Certified Change Practitioner
Principal

Congressional Requirements Support Approach

PRDoH is a complex, multi-faceted HHS agency that serves more than one and a half million residents across the Commonwealth's 78 cities and towns. PRDoH's mission is to streamline access to health services and allow citizens to fully enjoy their lives.

PRMP needs to address Congressional compliance requirements established by Congress in federal Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020, enacted on December 20, 2019. Congress has recommended 12 appropriation packages. For PRMP to continue to receive full federal financing and avoid penalties, PRMP will need to establish and adhere to policies and procedures. We understand that these compliance items can be daunting. BerryDunn can help guide PRMP through these requirements, and define and execute the plan for PRMP's compliance.

For a project as critical as this, PRMP will benefit from having an experienced and trusted team of both PRMP personnel and consulting partners to achieve its objectives. Compliance consulting can help drive project success by promptly identifying and making recommendations for risks and issues on all aspects of the effort—from Payment Error Rate Measurement (PERM) to contracting reform, reporting, and policy recommendations.

A compliance contractor can help ensure that the needs of both PRMP and the requirements established by federal organizations—including the Department of HHS, CMS, and others—are satisfied. Hiring a compliance-consulting partner that is both technically and managerially independent, as well as independent from PRMP, is essential to help ensure there are no real or perceived conflicts with the recommendations.

We understand that PRMP is looking for an experienced and capable partner, with proven expertise in CMS rules and regulations for this critical federal compliance project.

BerryDunn is a stable and well-established firm. We have maintained steady growth over our 46-year history by providing consistent, high-quality services to clients. This stability will give PRMP leadership confidence in our ability to serve as a long-term partner that will work side-by-side with your team to strengthen PRMP' compliance with federal requirements and enable PRMP to continue providing quality services to your constituents.

Below we describe how we will help PRMP in its mission to comply with the requirements set forth by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020.

INITIAL PROJECT PLANNING

To help ensure project success and a common understanding of requirements, BerryDunn will initially meet in San Juan to introduce project team members, review the Congressional requirements, and outline project tasks and responsibilities.

Task 1: Conduct initial planning call. Upon notice to proceed, the BerryDunn team will conduct an initial planning meeting via phone call to come to an agreement on a project approach to support PRMP with federal compliance. We will review our proposed work plan and schedule with PRMP and make any adjustments immediately following the meeting. We will also discuss our plan for information requests and the setup of a project repository that uses the existing document storage processes for BerryDunn's current work with PRMP.

Task 2: Request and review background documentation. Once we have an understanding of the approach that best suits your preferences, our team will request identified nonpublic information and documents such as procedures manuals, audit results, current reports, and training documentation that might have bearing on compliance efforts. All information will be used to increase our understanding of PRMP's current business processes. To help ensure we minimize the amount of time needed from PRMP, we will first request the information from BerryDunn's team currently supporting PRMP. If there is information they do not have readily available, we will then submit the request to PRMP. We will supplement the information provided by PRMP with publicly available information to determine the current environment and processes.

BerryDunn respectfully requests that PRMP provide available documentation prior to the project kickoff meeting and interviews, as reviewing this information in advance of on-site work enables us to be more efficient, become more knowledgeable of the current environment, and make best use of PRMP personnel's time.

Task 3: Prepare for and conduct project kickoff meeting. BerryDunn will conduct a kickoff meeting with the PRMP project administrator and key PRMP project staff. The purpose of this meeting will be to review our finalized Project Work Plan and Schedule, clarify compliance goals and objectives, identify known project constraints, and refine dates and/or tasks. As part of this meeting, we will discuss our approach for managing communications between BerryDunn and PRMP, as well as our approach to scope, risk, and resource management. We will request names and contact information for PRMP staff members who will be involved in the project, and we will schedule initial meetings.

BerryDunn plans to use BerryDunn KnowledgeLink, a customized Microsoft SharePoint tool used to share project documentation, and facilitate secure online communication and collaboration between BerryDunn and PRMP project teams. This application has the ability to maintain online project calendars, maintain lists of project team members and contact information, and serve as a repository for documents created throughout the engagement. We will work with the PRMP project administrator to provide the appropriate permissions for this site based on the responsibilities of the PRMP project team members.

If desired by PRMP, we will plan to manage risks, issues, decisions, action items, and the publication of project deliverables for the record-keeping project from BerryDunn KnowledgeLink.

Task 4: Revise Project Work Plan and Schedule. Based on feedback gathered from the PRMP point of contact in the initial project planning meetings, we will update the Project Work Plan and Schedule with revised dates and compliance activities as needed, delivering the final draft of the Project Work Plan and Schedule to the PRMP point of contact for approval.

- **Deliverable(s):** Project Work Plan and Schedule

TASK 1: PROGRAM INTEGRITY

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 1: Approach to Compliance with Program Integrity Requirements

Task #1: Program Integrity
<p>Requirement by Congress: Not later than 6 months after the date of the enactment of this paragraph, the agency responsible for the Administration of Puerto Rico’s Medicaid Program under Title XIX shall designate an officer (other than the Director of Such Agency) to serve as the Program Integrity Lead for the such Program.</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> PRMP currently has a Program Integrity Office. The selected vendor should advise and recommend changes to policies and procedures and scope of work to ensure compliance with Congress Requirement. Recommend if additional Human Resources are needed to strengthen the Medicaid Integrity Office. The selected vendor should develop and prepare a quarterly report draft to ensure compliance of the requirements and avoid penalties as stated in the law.
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p> <p><u>Service Approach</u></p> <p>BerryDunn will analyze PRMP’s Program Integrity Office to help ensure compliance with Congressional requirements. We will make recommendations regarding any changes including any Human Resource changes. We will develop a quarterly draft report to help ensure compliance and avoid penalties.</p> <p>The following identifies high-level activities to be completed in support of this service approach:</p> <ol style="list-style-type: none"> 1.1 Review existing Puerto Rico Program Integrity policies and laws to discuss questions or to obtain clarification, as needed 1.2 Prepare Program Integrity Policy and Procedure Recommendations 1.3 Present recommendations to PRMP <p><u>Deliverables</u></p> <ul style="list-style-type: none"> D01: Program Integrity Policy and Procedure Recommendations <p><u>Acceptance Criteria</u></p> <p>PRMP acceptance of the Program Integrity Policy and Procedure Recommendations will be deemed complete upon signature acceptance from PRMP confirming this deliverable complies with the information reflected within this Statement of Work (SOW).</p> <p><u>Key Staff:</u></p> <ul style="list-style-type: none"> Christy Schilling Aimée Campbell-O’Conner Yoko McCarthy Vanessa Cayer Ethan Wiley Bill Brown

TASK 2 AND TASK 4: PERM REQUIREMENT AND MEQC PREPARATION

To best serve the PRMP, BerryDunn has combined the efforts for Task 2 (PERM Requirements) and Task 4 (Medicaid Eligibility Quality Control (MEQC) Requirements). Since these tasks are closely related and the activities we have identified to complete each of these tasks are also similar, we will prepare a comprehensive plan for PRMP to deliver to CMS that will help assure Congress that PRMP is prepared to undertake all PERM and MEQC requirements.

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 2: Approach to Compliance with PERM and MEQC Requirements

Task #2 and Task #4: PERM and MEQC Requirements
<p>Requirement by Congress:</p> <p>PERM - Not later than 18 months after the date of the enactment of this paragraph, Puerto Rico shall publish a plan developed by Puerto Rico in coordination with the Administrator of CMS, and approved by the Administrator, for how Puerto Rico will develop measures to satisfy the payment error rate measurement (PERM) requirements under subpart of part 431 of Title 42 CFR or any successor regulation)</p> <p>MEQC – Not later than 18 months after the date of the enactment of this paragraph, Puerto Rico shall publish a plan, developed by Puerto Rico in coordination with the Administrator of CMS, and approved by the Administrator, for how Puerto Rico will comply with the Medicaid Eligibility Quality Control (MEQC) requirements of Subpart P of Part 431 of Title 42 CFR or any Successor regulation.</p>
<p>BerryDunn Requirements:</p> <p><u>PERM:</u></p> <ul style="list-style-type: none"> • Advise how the Plan to comply with the PERM should be developed. • The selected vendor should design a plan to implement the PERM in Puerto Rico. This is a new requirement and currently Puerto Rico does not have the scorecard measures. • The selected vendor should develop and prepare a draft of the quarterly report to ensure compliance of the requirements and avoid penalties as stated in the law. <p><u>MEQC:</u></p> <ul style="list-style-type: none"> • PRMP currently has a MEQC Office. The selected vendor should advise and recommend changes to policies and procedures and scope of work to ensure compliance of the Congress Requirements. • Make recommendations on how to fully comply with CMS MEQC requirements. • Recommend additional staff if needed to perform MEQC duties. • The selected vendor should develop and prepare a draft of the quarterly report to ensure compliance of the requirements and avoid penalties as stated in the law.
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p>

Task #2 and Task #4: PERM and MEQC Requirements

Service Approach

The following identifies high-level activities to be completed in support of this service approach:

Activity 1: Develop Draft Plan to meet PERM and MEQC Requirements

- 1.1 Review PR Medicaid laws, policies, and requirements to identify gaps in federal regulations; discuss findings
- 1.2 Develop Standard Operating Procedures to identify resource needs and assignment of resources to all necessary roles
- 1.3 Schedule biweekly status update meetings with client and necessary vendors Medicaid Management Information System (MMIS) to discuss updates on implementation of PERM requirements
- 1.4 Prepare Draft Plan Document
- 1.5 Review a mock claims file generated by MMIS according to statistical contractor requirements
- 1.6 Analyze data processing and medical record review requirements and PR's system and process adherence to PERM requirements
- 1.7 Develop Findings and Recommendation Report for errors in data processing and medical record review requirements
- 1.8 Schedule client meeting with appropriate vendors to discuss findings and recommendations
- 1.9 Prepare final plan document for submission to CMS; attend follow-up meetings with CMS; update plan as necessary pending CMS feedback
- 1.10 Attend CMS calls, as needed

Activity 2: Conduct mini-MEQC internal review

- 2.1 Develop review processes, tools (policy reference document, review form, budget calculator), and conduct internal review training
- 2.2 Generate sample
- 2.3 Client discussion and training of systems and processes/Conduct 60 eligibility reviews
 - 2.3.1 Client meetings to discuss questions during reviews
 - 2.3.2 Develop findings and recommendation report for errors in eligibility determination review requirements
- 2.4 Client meeting to discuss final report and recommendations

Activity 3: Quarterly Status Report

- 3.1 Develop Quarterly Status Report to identify risks associated with meeting deadlines identified in Task 1 – Task 4

Deliverables

- **D02: Standard Operating Procedures**
- **D03: PERM and MEQC Draft Plan Document**
- **D04: Findings and Recommendation Report**
- **D05: Final Report**
- **D06: Quarterly Status Report**

Task #2 and Task #4: PERM and MEQC Requirements

Acceptance Criteria

PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.

Key Staff

- Christy Schilling
- Yoko McCarthy
- Vanessa Cayer
- Zach Rioux

TASK 3: CONTRACTING REFORM

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 3: Approach to Compliance with Contracting Reform Requirements

Task #3: Contracting Reform
<p>Requirement by Congress: Not later than 12 months after the date of the enactment of this paragraph, Puerto Rico shall publish a contract reform plan to combat fraudulent, wasteful or abusive contracts under Puerto Rico’s Medicaid Program under Title XIX.</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> • Advice regarding the development of the Plan to comply with the Contract reform as required by Federal and Puerto Rico Law, rules, regulations and federal policy established by CMS and Government Agencies best practices. • The plan should include metrics for evaluating the success of the plan. • Document recommended new contract business processes. • If needed, should recommend new or amendments to existing local laws and Regulations. • The selected vendor should develop and prepare a draft of the quarterly report to ensure compliance of the requirements and avoid penalties as stated in the law.
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p> <p><u>Service Approach</u></p> <p>Fraudulent, wasteful contracts cost Puerto Rico taxpayers’ money and abuse patient and providers’ trust. BerryDunn will help PRMP develop a plan to comply with contract reform measures. The plan will include success metrics, recommendations on business process improvements, and potential regulation changes. It will also allow BerryDunn to leverage our previous EOMC SOW contract management efforts completed in support of PRMP. The following identifies high-level activities to be completed in support of this service approach:</p> <ol style="list-style-type: none"> 1 Research existing federal and PR contracts, new policies, procedures, and regulations 2 Interview PRMP for information gathering and validation 3 Draft Deliverable Expectation Document (DED) for Contract Implementation Plan 4 Walk through Contract Implementation Plan DED 5 Draft Contract Reform Implementation Plan 6 Perform peer review of Contract Reform Implementation Plan 7 Update Contract Reform Implementation Plan 8 Perform editing and proofing 9 Walk through Contract Reform Implementation Plan with PRMP

Task #3: Contracting Reform

- 10** Update and revise Contract Reform Implementation Plan (includes updates resulting from client meetings and CMS reviews)

Deliverables

- **D07: Contract Implementation Plan DED**
- **D08: Contract Reform Implementation Plan**

Acceptance Criteria

PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.

Key Staff

- Misha Mosher
- Ethan Wiley
- Zach Rioux

TASK 5: TREATMENT OF FUNDING UNDER SECTION 1935(e)

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 5: Approach to Compliance with Treatment of Funding Under Section 1935(e) Requirements

Task #5: Treatment of Funding Under Section 1935(e)
<p>Requirement by Congress: Treatment of Funding Under Enhanced Allotment Program – Section 1935 (e) of the Social Security Act (42 USC1396 u -5e as amended).</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> • Advice regarding the development of the Plan to comply with the Contract reform as required by Evaluate the current Puerto Rico special needs plan for dual eligible and recommend changes needed. • Evaluate the requirement established by Congress. • Determine steps to be taken to fully comply with this requirement. • Develop a step-by-step plan needed to comply with Congress.
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p> <p><u>Service Approach</u></p> <p>Our staff are prepared to evaluate the special needs of Puerto Rico’s dual-eligible population and the Congressional requirements. We will develop a plan to help ensure the PRMP is federally compliant. The following identifies high-level activities to be completed in support of this service approach:</p> <p>Activity 1: Evaluate the current special needs and recommend changes</p> <ol style="list-style-type: none"> 1.1 Review plan and look at CMS Medicaid guidance on duals and Part D 1.2 Perform background research and determine how other territories have met the plan requirement 1.3 Compile high-level list of recommendations 1.4 Meet with PRMP to discuss recommendations 1.5 Complete and deliver the Recommendations Report <p>Activity 2: Evaluate the requirement established by Congress and determine steps for compliance</p> <ol style="list-style-type: none"> 2.1 Perform background research and policy analysis on how the other territories are demonstrating compliance 2.2 Compile high-level list of processes and steps to demonstrate compliance with Section 1935(e) funding 2.3 Meet to discuss findings and options with PRMP 2.4 Complete and deliver Roadmap Document <p>Activity 3: Develop a plan for Congressional compliance</p> <ol style="list-style-type: none"> 3.1 Conduct strategy session with PRMP

Task #5: Treatment of Funding Under Section 1935(e)

- 3.2 Merge findings from Recommendations Report and Roadmap Document
- 3.3 Draft Final Congressional Compliance Plan
- 3.4 Walk through Final Congressional Compliance Plan with PRMP
- 3.5 Revise and deliver Final Congressional Compliance Plan based on feedback

Deliverables

- **D09: Recommendations Report**
- **D010: Roadmap Document**
- **D011: Final Congressional Compliance Plan**

Acceptance Criteria

PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.

Key Personnel

- Ethan Wiley
- Yoko McCarthy
- Bill Richardson

TASK 6: ANNUAL REPORT

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 6: Approach to Compliance with Annual Report Requirements

Task #6: Annual Report
<p>Requirement by Congress: Annual Report- In general not later than the date that is 30 days after the end of each fiscal year (beginning with fiscal year 2020 and ending with fiscal year 2021), in the case that a specified territory receives a Medicaid cap increase, or an increase in the federal medical assistance percentage for such territory under section 1905 (ff), for such fiscal year, such territory shall submit to the Chair and Ranking Member of the Committee on Energy and Commerce of the House of Representatives and the Chair and Ranking Member of the Committee of Finance of the Senate a report, employing the most up-to- date information available, that describes how such territory has used such Medicaid cap increase, or such applicable, to increase access to health care under the State Medicaid plan of such territory under title XIX (or a waiver of such plan). Such report may include- “(i) the extent to which such territory has, with respect to such plan (or waiver)-“(I) increased payments to health care providers; “(II) increased covered benefits; “(III) expanded health care provider networks; or “(IV) improved in any other manner the carrying out of such plan (or waiver); and “(ii) any other information as determined necessary by such territory.</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> • Evaluate the requirement established by Congress. • Determine steps to be taken to fully comply with this annual report. • Develop a document with the information needed to ensure compliance with this report. <p>This plan should at least: Provide counseling and support to develop and implement, at least, the following strategies:</p> <ul style="list-style-type: none"> • How Puerto Rico has used the: <ul style="list-style-type: none"> ✓ Medicaid Cap increase or ✓ Federal Medical Assistance Percentage (FMAP) increase • Increase access to health care • Increased payments to health care providers; • Increased covered benefits; • Expanded health care provider networks; or • Improved in any other manner the carrying out of such plan; and • Any other information as determined necessary <p>The Puerto Rico Medicaid Program Annual Report to the Congress shall consider the following 3 elements:</p> <ul style="list-style-type: none"> • Employing the most up-to-date information available • Description of how Puerto Rico has used the Medicaid Cap increase or such increase in the Federal Medical Assistance Percentage (FMAP) • Increase access to health care <p>Puerto Rico REPORT may include--</p> <ul style="list-style-type: none"> • The extent to which Puerto Rico is involved with creating such plan.

Task #6: Annual Report

- Increased payments to health care providers;
- Increased covered benefits;
- Expanded health care provider networks; or
- Improved in any other manner the carrying out of such plan; and
- Any other information as determined necessary by Puerto Rico.

The following details BerryDunn's proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.

Service Approach

BerryDunn will evaluate Congress' requirement for an annual report on Medicaid cap increases, or an increase in the federal medical assistance percentage (FMAP) and how such increased funding has increased access to care for the Puerto Rican beneficiary and provider populations. We will help ensure the PRMP annual report is compliant with the requirement. The following identifies high-level activities to be completed in support of this service approach:

Activity 1: Develop Compliance Report

- 1.1 Perform background research and policy analysis
- 1.2 Determine and evaluate potential increases in either FMAP or Medicaid cap
- 1.3 Review reports completed by other territories for structure
- 1.4 Draft Policy Analysis Summary
- 1.5 Update Policy Analysis summary based on feedback

Activity 2: Determine Steps Towards Annual Report Compliance

- 2.1 Conduct strategy sessions based on findings of policy analysis
- 2.2 Determine and review data sources for services, beneficiaries, rates, and providers; establish baseline for comparison to new numbers
- 2.3 Draft Compliance Plan
- 2.4 Review Draft Compliance Plan with PRMP
- 2.5 Update Compliance Plan with PRMP feedback

Activity 3: Develop Puerto Rico Medicaid Program Annual Report to the Congress

- 3.1 Draft Puerto Rico Medicaid Program Annual Report to the Congress
- 3.2 Review Draft Medicaid Program Annual Report to the Congress with PRMP
- 3.3 Update draft with feedback from PRMP
- 3.4 Deliver final report

Deliverables

- **D12: Policy Analysis Summary**
- **D13: Compliance Plan**
- **D14: Puerto Rico Medicaid Program Annual Report to the Congress**

Task #6: Annual Report

Acceptance Criteria

PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.

Key Personnel

- Ethan Wiley
- Aimée Campbell-O'Conner
- Andrea Clark
- Valerie Hamilton
- Bill Richardson

TASK 7: REPORT ON CONTRACTING OVERSIGHT AND APPROVAL

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 7: Approach to Compliance with Report on Contracting Oversight and Approval Requirements

Task #7: Report on Contracting Oversight and Approval
<p>Requirement by Congress: Report on Contracting Oversight and Approval- Not later than 1 year after the date of enactment of this Act, the Comptroller General of the United States shall issue, and submit to the Chair and Ranking Member of the Committee on Energy and Commerce of the House of Representatives and the Chair and Ranking Member of the Committee on Finance of the Senate, a report on contracting oversight and approval with respect to Puerto Rico’s State plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.) (or a waiver such plan). Such report shall- (A) examine- (i) the process used by Puerto Rico To evaluate bids and award contracts under such plan (or waiver); (II) which contracts are not subject to competitive bidding or requests for proposals under such plan (or waiver); and (iii) oversight by the Centers for Medicare & Medicaid Services of contracts awarded under such plan (or waiver); and (b) include any recommendations for Congress, the Secretary of Health and Human Services, or Puerto Rico relating to changes that the Comptroller General determines necessary to improve the program integrity of such plan (or waiver).</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> • Evaluate current process used by Puerto Rico to evaluate bids and award contracts under State Plan. • Recommend which contracts are not subject to competitive bidding or requests for proposals under current State Plan. • Along with PRMP Management, prepare responses to possible findings and recommendations made by the Comptroller General
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p> <p><u>Service Approach</u></p> <p>BerryDunn will evaluate PRMP contracting processes, make recommendations, and will help prepare findings to submit to the Comptroller General. The following identifies high-level activities to be completed in support of this service approach:</p> <p>Activity 1: Evaluate current contracting oversight process</p> <ul style="list-style-type: none"> 1.1 Document review of the policies and procedures, State Plan, organizational chart, etc. 1.2 Conduct fact-finding interviews and document current process 1.3 Conduct sample testing of contracting oversight process <p>Activity 2: Reporting</p> <ul style="list-style-type: none"> 2.1 Draft report of recommendations to the current process (including recommendation on which contracts are not subject to competitive bidding or requests for proposals under current State Plan) 2.2 Present Recommendations Report to PRMP management

Task #7: Report on Contracting Oversight and Approval

Activity 3: Assist PRMP management in responding to the Comptroller General's Report

3.1 Meet with PRMP management to discuss possible responses to Comptroller General's report

3.2 Draft Responses to the Comptroller General's Report in coordination with PRMP management

Deliverables

- **D15: Recommendations Report**
- **D16: Draft Responses to the Comptroller General's Report**

Acceptance Criteria

PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.

Key Personnel

- Yoko McCarthy
- Vanessa Cayer
- Bill Brown

TASK 8: AUDITS OF MANAGED CARE PAYMENTS

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 8: Approach to Compliance with Audits of Managed Care Payments Requirements

Task #8: Audits of Managed Care Payments
<p>Requirement by Congress: Audits of Managed Care Payments. – Not later than the date that is 1 year after the date of enactment of this Act, the Inspector General shall develop and submit to Congress- (A) A report identifying payments made under Puerto Rico’s Medicaid program to managed care organizations that the Inspector General determines to be at high risk for waste, fraud, or abuse; and (B) a plan for auditing and investigating such payments.</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> Evaluate current process used by Puerto Rico to make payments to the Managed Care organizations. Recommend if current process represent risks of fraud waste or abuse. Along with PRMP Management, prepare responses to possible findings made by the Office of Inspector general.
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p> <p><u>Service Approach</u></p> <p>We will evaluate payments made to Managed Care Organizations, identify potential fraud, waste, or abuse and will help prepare possible findings for the Office of the Inspector General (OIG). The following identifies high-level activities to be completed in support of this service approach:</p> <p>Activity 1: Document review and Fieldwork</p> <ol style="list-style-type: none"> 1.1 Request and review procedures, organization chart, and current process for Managed Care Organization payments 1.2 Conduct on-site interviews, observation, and testing <p>Activity 2: Reporting</p> <ol style="list-style-type: none"> 2.1 Draft Report of Recommendations to the current process 2.2 Present recommendations to PRMP management <p>Activity 3: OIG Findings</p> <ol style="list-style-type: none"> 3.1 Review OIG findings 3.2 Meet with PRMP management to discuss possible responses to OIG report 3.3 Draft OIG Responses in coordination with PRMP management <p><u>Deliverables</u></p> <ul style="list-style-type: none"> D17: Recommendations Report D18: OIG Responses

Task #8: Audits of Managed Care Payments

Acceptance Criteria

PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.

Key Personnel

- Yoko McCarthy
- Vanessa Cayer
- Andrea Clark
- Bill Brown

TASK 9: SYSTEM FOR FUNDING TRACKING

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 9: Approach to Compliance with System for Funding Tracking Requirements

Task #9: System for Funding Tracking
<p>Requirement by Congress: System for tracking Federal Funding Provided to Puerto Rico; Medicaid and Chip scorecard reporting. -Section 1902 of the Social Security Act (42 U.S.C.1396a), as amended by subsection (e), is further amended by adding at the end the following new subsection:” (rr) Program Integrity requirements for Puerto Rico.- “(1) System for tracking federal Medicaid Funding Provided to Puerto Rico.-</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> The selected vendor should advise and recommend policies and procedures and scope of work to help ensure compliance of the Congress Requirement. This is a new requirement and currently Puerto Rico does not have the scorecard measures. Evaluate requirement established by Congress. If needed, design and prepare if a template for the report.
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p> <p><u>Service Approach</u></p> <p>BerryDunn will help PRMP establish policies and procedures to help ensure compliance with tracking Federal Funding. We will recommend adopting the Medicaid and CHIP scorecard reporting and will create a template upon request. The following identifies high-level activities to be completed in support of this service approach:</p> <p>Activity 1: Evaluation</p> <ol style="list-style-type: none"> 1.1 Perform background research and policy analysis 1.2 Review other territories to determine what they are using for a solution 1.3 Evaluate requirement established by Congress. 1.4 Prepare Policy Brief <p>Activity 2: Prepare Template</p> <ol style="list-style-type: none"> 2.1 Develop DED for Report Template 2.2 Draft Report Template 2.3 Review draft with PRMP 2.4 Refine draft based on feedback and submit <p><u>Deliverables</u></p> <ul style="list-style-type: none"> D19: Policy Brief D20: Report Template

Task #9: System for Funding Tracking

Acceptance Criteria

PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.

Key Personnel

- Ethan Wiley
- Yoko McCarthy
- Vanessa Cayer

TASK 10: CMS-64 AND CMS-37 REPORTING

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 10: Approach to Compliance with CMS-64 and CMS-37 Reporting Requirements

Task #10: CMS-64 and CMS-37 Reporting
<p>Requirement by Congress: “(A) In general- Puerto Rico shall establish and maintain a system, which may include the use of a quarterly Form CMS-64, for tracking any amounts paid by the Federal Government to Puerto Rico with respect to the State plan of Puerto Rico (or a waiver of such plan). Under such system, Puerto Rico shall ensure that information is available, with respect to each quarter in a fiscal year (beginning with the first quarter beginning on or after the date that is 1 year after the date of the enactment of this bisection), on the following: “(I) In the case of a quarter other than the first quarter of such fiscal year-“ (I) the total amount expended by Puerto Rico during any previous quarter of such fiscal year under the State plan of Puerto Rico (or a waiver of such plan); and “(II) a description of how such amount was so expended. “(ii) The total amount that Puerto Rico expects to expend during the quarter under the State plan of Puerto Rico (or a waiver of such plan) and a description of how Puerto Rico expects to expend such amount.</p> <p>“(B) Report To CMS.- For each quarter with respect to which Puerto Rico under subparagraph (A) to ensure that information described in such subparagraph is available, Puerto Rico shall submit to the Administrator of the Centers for Medicare & Medicaid Services a report on such information for such quarter, which may include the submission of a quarterly Form CMS-37.</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> PRMP Staff currently completes and submits the CMS-37 and CMS-64 on a timely manner. However, we require the selected vendor to propose an executive summary draft to send with the CMS-37 and the CMS-64. Recommend what should be included in the narrative section on the CMS-37 and CMS-64. If needed, design and prepare a fact sheet that includes all the needed requirements.
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p> <p><u>Service Approach</u></p> <p>BerryDunn will review the CMS-37 and CMS-64 reports and will propose an executive summary for PRMP’s review. We will make recommendations regarding the narrative and if requested, will design and prepare a fact sheet. The following identifies high-level activities to be completed in support of this service approach:</p> <ol style="list-style-type: none"> 1.1 Perform background research and policy analysis 1.2 Review other territories to determine what they are using for executive summaries 1.3 Develop an Executive Summary draft to send with the CMS-37 and the CMS-64 1.4 Develop recommendations on what should be included in the narrative section on the CMS-37 and CMS-64 1.5 Review recommendations and executive summary draft with PRMP

Task #10: CMS-64 and CMS-37 Reporting

- 1.6 Revise Executive Summary language with PRMP feedback
- 1.7 Design and prepare a Fact Sheet that includes all the needed requirements.
- 1.8 Review Fact Sheet draft with PRMP
- 1.9 Revise Fact Sheet with PRMP feedback

Deliverables

- **D21: Executive Summary**
- **D22: Fact Sheet**

Acceptance Criteria

PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.

Key Personnel

- Ethan Wiley
- Yoko McCarthy
- Vanessa Cayer

TASK 11: STATE PLAN DOCUMENTATION

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 11: Approach to Compliance with State Plan Documentation Requirements

Task #11: State Plan Documentation
<p>Requirement by Congress: Request – Puerto Rico shall, upon request, submit to the Administrator of the Center for Medicare & Medicaid Services all documentation requested with respect to contracts awarded under the State plan of Puerto Rico (or waiver of such plan).</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> Evaluate all documentation that is required in current contracts. Recommend a process on how to report to CMS PRMP’s current contracts.
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p> <p><u>Service Approach</u></p> <p>BerryDunn will evaluate all contract documentation and will recommend a process on reporting to CMS. The high-level activities in support of this service approach are detailed below:</p> <ol style="list-style-type: none"> Evaluate existing client contracts and identify gaps with required CMS documentation and references Draft CMS Documentation Recommendations to address CMS documentation gaps in existing contracts Walk through of recommendations with PRMP, as needed Identify and evaluate existing processes between PR and CMS for documentation requests Draft a Recommended Process for Handling CMS Contract Documentation Requests Walkthrough process with PRMP <p><u>Deliverables</u></p> <ul style="list-style-type: none"> D23: Draft CMS Documentation Recommendations D24: Recommendations for handling CMS contract documentation requests <p><u>Acceptance Criteria</u></p> <p>PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.</p> <p><u>Key Personnel</u></p> <ul style="list-style-type: none"> Misha Mosher Zach Rioux

TASK 12: SCORECARD REPORTING

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 12: Approach to Compliance with Scorecard Reporting Requirements

Task #12: Scorecard Reporting
<p>Requirement by Congress: “(3) Reporting on Medicaid and Chip scorecard measures-Beginning 12 months after the date of enactment of this subsection, Puerto Rico shall begin to report to the Administrator of the Center for Medicare & Medicaid Services on selected measures included in the Medicaid and Chip Scorecard developed by the Center for Medicare & Medicaid Services”.</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> • Evaluate Congress requirements. • Design a plan to be presented to CMS to determine what information should be included in the Scorecard Measures report. This is a new requirement and Puerto Rico does not have the scorecard measures in place. • Develop a draft of the Scorecard Measures report. • This reporting should include two phases, the cost of the scorecard measures and the reporting of the scorecard measures.
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p> <p><u>Service Approach</u></p> <p>BerryDunn will evaluate scorecard requirements, design a plan for scorecard measurements, and draft a two-phased report. The following identifies high-level activities to be completed in support of this service approach:</p> <p>Activity 1: Evaluation of requirements</p> <ol style="list-style-type: none"> 1.1 Perform background research and policy analysis 1.2 Develop DED for Current State Overview 1.3 Review scorecards submitted by other territories 1.4 Determine necessary data elements 1.5 Evaluate the requirements based on system capability 1.6 Prepare Current State Overview 1.7 Review Current State Overview with PRMP 1.8 Refine Current State Overview as necessary <p>Activity 2: Plan Design</p> <ol style="list-style-type: none"> 2.1 Determine what system updates are needed for all the metrics 2.2 Develop DED for Draft Scorecard Plan 2.3 Conduct strategy and fact-finding meetings with PRMP

Task #12: Scorecard Reporting

- 2.4 Draft Scorecard Plan
- 2.5 Discuss Draft Scorecard Plan with PRMP
- 2.6 Present Draft Scorecard Plan to CMS for discussion
- 2.7 Update Scorecard Plan based on CMS feedback
- 2.8 Determine additional development needs and support PRMP (i.e. APD development)
- 2.9 Create Final Scorecard Plan
- 2.10 Refine Final Scorecard Plan as necessary and submit to PRMP

Activity 3: Scorecard Measures Report

- 3.1 Develop DED for Scorecard Measures Report
- 3.2 Build off of analysis and design in Task groups 2 and 3 to determine cost
- 3.3 Meet with PRMP and confirm Report format, validate data, and confirm costs

Activity 4: Scorecard Measures Reporting

- 4.1 Draft Scorecard Measures Report
- 4.2 Present draft of Scorecard Measures Report to PRMP
- 4.3 Refine draft of Scorecard Measures Report as necessary
- 4.4 Submit Scorecard Measures Report
- 4.5 Provide additional support to PRMP related to the scorecard as necessary

Deliverables

- **D25: Current State Overview**
- **D26: Scorecard Plan**
- **D27: Scorecard Measures Report**

Acceptance Criteria

PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.

Key Personnel

- Ethan Wiley
- Andrea Clark
- Valerie Hamilton

TASK 13: POLICY

The following table details BerryDunn’s proposed high-level approach to assist PRMP in achieving compliance with Congressional requirements set forth via by Congress in Act: P.L. 116-94, Further Consolidated Appropriations Act, 2020. This table also includes details on potential project deliverables and staffing levels BerryDunn envisions supporting this task.

Table 13: Approach to Compliance with Policy Requirements

Task #13: Policy
<p>Requirement by Congress:</p> <p>In general for each fiscal quarter during the period beginning on January 1, 2020, and ending on September 30, 2021:</p> <p>(I) for every clause under sub paragraph (A) with respect on which Puerto Rico does not fully satisfy the requirements described in the clause (including requirement imposed under the terms of a plan described in the clause) in the fiscal quarter, the Federal medical assistance percentage applicable to Puerto Rico under section 1905 (ff) shall be reduced by the number of percentage points determined for the clause and fiscal quarter under subclause (II).</p> <p>(II) The number of percentage points determined under for this subclause with respect to a clause under subparagraph (A) and a fiscal quarter shall be the number of percentage points (not to exceed 2.5 percentage points equal to: (aa) 0.25 percentage points; multiplied by (bb) the total number of consecutive fiscal quarters for which Puerto Rico has not fully satisfied the requirements described in such clause.</p>
<p>BerryDunn Requirements:</p> <ul style="list-style-type: none"> • Recommend policies and procedures in order to avoid penalties. • Develop a calendar based on requirements of important dates and milestones needed.
<p>The following details BerryDunn’s proposed service approach, deliverables, and related acceptance criterion in support of this Congressional requirement. All documents will be delivered to PRMP 30 days prior to the due date detailed in the requirement.</p> <p><u>Service Approach</u></p> <p>BerryDunn will work with PRMP to evaluate the new Congressional requirements and will recommend policies and procedures to help ensure that PRMP avoids penalties. We will develop a calendar to track important milestones and dates of the requirements.</p> <p>Activity 1: Policy Recommendations</p> <ol style="list-style-type: none"> 1 Recommend Policies and Procedures in order to avoid penalties 2 Develop a calendar based on requirements of important dates and milestones needed 3 Schedule an internal check-in status meetings <p><u>Deliverables</u></p> <ul style="list-style-type: none"> • D29: Policy Recommendations <p><u>Acceptance Criteria</u></p> <p>PRMP acceptance of the deliverables detailed within this section will be deemed complete upon signature acceptance from PRMP confirming these deliverables comply with the information reflected within this SOW.</p>

Task #13: Policy

Key Personnel

- Christy Schilling
- Yoko McCarthy
- Vanessa Cayer

Staffing Approach

Our PRMP compliance team, ***inclusive of Puerto Rico Spanish speakers***, is available and ready to assist PRMP in its efforts to comply with ACT: P.L. 116-94, Further Consolidated Appropriations Act, 2020. Our team is also committed to being on-site as is necessary to help ensure compliance with the requirements set forth by Congress.

As previously detailed, BerryDunn’s team of compliance experts have worked hard in previous work to build connections with CMS and Congress, and will help PRMP to develop relationships with various Federal partners. Our extensive expertise with CMS rules and regulations will help guide PRMP through these new requirements.

BerryDunn will assign an experienced Project Manager, Ethan Wiley for this effort. Ethan will look collectively at all of the compliance tasks and will manage the timeline. The approach will account for any efficiencies that can be gained and any overlap with our current work supporting PRMP. Ethan will provide guidance and organization for the project and will help ensure that Puerto Rico is compliant with these new Congressional requirements.

BerryDunn’s team of compliance experts bring with them a unique set of qualifications to assist PRMP in obtaining compliance set forth by Congress:

- **We have a successful history of working with Puerto Rico agencies to help them comply with state and federal regulations.** We are currently providing objective monitoring and control services to the PRMP, and those services have allowed us to support PRMP in achievement of State and Federal Regulations. Such activities completed thus far in support of PRMP’s state and federal compliance efforts include but are not limited to:
 - Puerto Rico Medicaid Management Information System (PRMMIS) Phase I Certification Assistance
 - PRMMIS Phase 2 Certification Assistance
 - Puerto Rico Eligibility and Enrollment (PREE) Project Certification Assistance
 - APDs development, submission, and approval
 - Contract management assistance services
 - Medicaid Information Technology Architecture (MITA) State Self-Assessment (SS-A) Updates
 - Medicaid enterprise Subject Matter Expert (SME) support
- **We are highly experienced and credentialed auditors who are ready to assist PRMP.** In addition to the professional audit experience and subject matter expertise, our team brings a robust set of certifications and credentials to this evaluation—including four Certified Public Accountants (CPAs), four Certified Fraud Examiners (CFEs), a lawyer, a Certified Information Systems Auditor (CISA), and a Certified Government

Financial Manager (CGFM). PRMP will have confidence in our team's ability to conduct this evaluation in a thorough and professional manner.

- **We offer a staffing approach repeatedly proven to provide maximum value to our clients.** We offer deep Medicaid compliance, reporting, and government best practices experience and project management experience from our project leads, specialized skills from subject matter experts (SMEs), and technical and administrative skills from our supporting staff. Our goal is to bring PRMP the right resources for the right tasks at the right time throughout the project, to help our team perform efficiently and cost effectively. Our proposed project manager and other team members have experience providing services on similar projects.

We understand that this work requires urgency and our key staff, including Ethan Wiley, Yoko McCarthy, Vanessa Cayer, and Christy Shilling are available to begin upon CMS approval of the contract. As we have demonstrated, we will have staff in San Juan and we will also have staff who can meet with CMS and Congressional representatives in the District of Columbia.

Below, we provide a brief introduction to our proposed engagement team. We can provide full resumes upon request.

Ethan Wiley

Project Manager, Manager | MPPM, PMP, Prosci® CCP, LSSGB

Ethan is a manager in BerryDunn's Government Consulting Group and an experienced project manager with progressive Medicaid transformation experience across the breadth of the Medicaid enterprise. His specialties include federal compliance, waivers, federal health programs and legislation, health policy and program development, legislative remediation, and implementation of solutions to help Medicaid agencies to better understand and meet their program goals.

Most recently, Ethan has successfully negotiated a 1915(c) Home and Community-Based Services (HCBS) waiver for Children with Serious Emotional Disturbance (SED) with CMS on behalf of the State of West Virginia. Previously, Ethan assisted in the successful negotiation of West Virginia's 1115 Waiver for substance use disorder (SUD), the first stand-alone waiver of its kind in the country. Throughout both these processes, Ethan built crucial relationships with state staff, Medicaid agency leadership, and the federal partners they were working with. In addition, Ethan fielded questions, met with providers and members of the public, and drafted fact sheets and coordinated communication to stakeholders to help with the negotiation process.

Aimée Campbell-O'Conner

CMS SME, Senior Consultant | LCSW

Aimée is an experienced federal compliance expert and former CMS State lead. Aimée previously served on project management units for the State of Maine and the District of Columbia child welfare agency. Her experience includes convening stakeholders, researching and developing options, and implementing a plan to move to a solution. She served as the grant project director with oversight of staff and grant activities for a CHIPRA demonstration grant

awarded to Maine and Vermont, and comes from a long background in child welfare. Aimée worked for CMS for 7 years as the Maine state lead responsible for moving proposed State Plans through the CMS review process in the Division of Medicaid and Children’s Health Operations, Aimée was responsible for the analysis and understanding of the scope of the changes proposed as well as understanding of how those changes might intersect with other pieces of the Medicaid State Plan.

Yoko McCarthy

Compliance Lead, Manager | MBA, CFE, CISA, CGFM

Yoko is a manager in BerryDunn’s Government Assurance Practice Area and leads our Compliance and Risk Management practice with over 15 years of audit and program integrity experience through her work with BerryDunn clients and her prior role with the Massachusetts State Auditor’s Office. Over the past five years, Yoko has managed 15 financial and programmatic audits for state-based health insurance exchanges in Minnesota, Rhode Island, Vermont, and Washington, which involves evaluating compliance with federal regulatory requirements and conducting eligibility, enrollment, and verification testing. In addition, Yoko has led the Medicaid Eligibility Review for the State of Alaska, in which her team conducted eligibility redeterminations of 190 sampled Medicaid and CHIP beneficiaries.

Vanessa Cayer

Compliance, Manager | MBA, PMP, CFE

Vanessa is a manager in BerryDunn’s Government Assurance Practice Area, with experience as a lead analyst and project manager specializing in financial and programmatic compliance. Vanessa’s focus is data analysis; risk assessments; financial process improvement; and programmatic, IT control, and forensic auditing. Vanessa has been leading the promoting interoperability incentive program audits for six years and has also been a lead auditor on several state’s Health Insurance Exchange audits where she has learned program rules and regulations. She has strong planning and managing skills, as well as a detailed understanding of audit and financial procedures. Vanessa is a Certified Fraud Examiner. She helps public-sector clients identify compliance issues and make lasting improvements to their programs.

Christy Schilling

PERM/MEQC Lead, Senior Consultant

Christy has six years of direct PERM/MEQC experience, including a breadth of understanding for federal and state regulations as they relate to PERM requirements. Christy’s experience includes four years of conducting PERM eligibility reviews in multiple states and assisting CMS with the development of the PERM eligibility review component reintroduced by CMS through the Final Rule published on July 5, 2017. Christy also adds value to this project through her project work with the West Virginia Bureau for Medical Services (BMS) and West Virginia CHIP (WVCHIP) where she identified ways to improve internal processes and implement changes to help ensure federal compliance measures were in place before PERM reviews began in 2019. Christy has used her robust experience to provide guidance to BMS and WVCHIP throughout

the current RY 2020 PERM cycle as well, including both preparation work with CMS contractors as well as providing direction to BMS and WVCHIP in regards to questions and issues that arise during the review process. Additionally, Christy served as the lead analyst for the Medicaid Eligibility Review for the State of Alaska, applying her past eligibility review expertise to the larger BerryDunn team conducting the eligibility redeterminations of 190 sampled Medicaid and CHIP beneficiaries.

Misha Mosher

Contracting Lead, Senior Consultant | JD and LLM

Misha is an experienced legal professional with proven contract management, research, and analysis skills. She brings knowledge of the legal industry, trade publications, government regulations, procurement, intellectual property, technology licensing, privacy and security, and risk management.

Andrea Clark

Healthcare Data and Economics SME, Senior Manager | MS

Andrea conducts quantitative research on various healthcare topics, with a primary focus on Medicaid managed care and topics in healthcare reform. She has extensive experience preparing Medicaid managed care capitation rate bids for clients covering over 1,000,000 combined lives, including coordinating clinical and actuarial input; performing complex financial and quality assessment analyses on health insurance claims and other client data; and has extensive experience programming HEDIS and IPRO quality measures and building, implementing, and maintaining episode of care logic in large, complex healthcare claim databases. **She speaks and writes Spanish.**

Valerie Hamilton

Healthcare Policy SME, Senior Manager | RN, JD, MHA

Valerie is a senior health policy manager in BerryDunn's Health Analytics Practice Area, with over 20 years of experience working with healthcare providers and institutions. After graduation, she broadened her healthcare experience by working in several different capacities at The Ohio State University Wexner Medical Center. Valerie has expertise in clinical provider operations, healthcare policy, healthcare law, quality improvement processes, and healthcare business operations. As a health policy manager, Valerie is responsible for reviewing literature on medical efficacy and performing legal research relating to issues of insurance coverage and benefits. She manages projects that include medical efficacy review and related cost estimates.

Christina Gibbons

Project Coordinator, Consultant | LSW

Christina has been working with BerryDunn since 2019 supporting PRMP. While a resident of Minnesota, Christina currently lives in San Juan while she is completing her Clinical Masters in Social Work at Universidad Ana G. Mendez in San Juan. She will graduate May 2020. Christina chose to pursue her degree in Puerto Rico to focus on her **Spanish skills**, as the master's program is entirely in Spanish. She is fluent in both written and verbal English and Spanish. Prior to joining BerryDunn, Christina worked as a licensed social worker in a school setting, supporting non-English speaking families. She also has 7+ years of experience as a family intervention specialist for a non-profit agency focused on providing rehabilitation services for

court-ordered offenders. She is currently a licensed social worker (LSW) and upon completion of her degree in Puerto Rico will be a licensed clinical social worker (LCSW).

Zach Rioux
Engagement Manager, Manager | PMP®

Zach is a manager in BerryDunn's Government Consulting Group, and for the last six years has worked with State agencies supporting their Medicaid Enterprise. His project work has included overseeing and assisting MMIS and EE certification, testing, and deliverable review teams, and verifying that the DDI vendor's project management, testing, and design documents adequately supported system functionality, RFP requirements, and related certification requirements. Throughout Zach's six years with BerryDunn, he has assisted in the oversight of engagements as large as eighty-plus full time equivalents (FTEs); and has helped to develop and grow relationships between State and Federal agencies through his support of State's APDs, his participation in white paper committees, and his attendance and participation in conferences and workgroups year to year.

Since June 2019, Zach has been providing project management and engagement management support to the EOMC services BerryDunn is currently providing to the PRMP. Throughout his time supporting PRMP, Zach has also worked with PRMP to enhance its relationship with federal partners via his support of PRMP's APDs, the MMIS and EE certification efforts, and the MITA SS-A.

Bill Richardson
Engagement Principal, Principal | PMP®, ITIL, Prosci® CCP

Bill is a principal in BerryDunn's Government Consulting Group with 19 years of experience supporting Medicaid agencies from policy and waiver work to systems to business process. Bill has worked with multiple states and territories in his career and currently works with Human Services programs in Missouri, Ohio, and Puerto Rico. Bill is also a MHA candidate at the number two program at the University of Minnesota, School of Public Health.

Bill Brown
Compliance Principal, Principal | CPA, MAFF, CFE

As the principal leading BerryDunn's Government Assurance Practice Area, Bill oversees performance and IT audit engagements for state and local governments, as well as program integrity, fraud, and risk audits. Bill has led our recent performance and financial audits for the Alaska Division of Legislative Audit, Colorado Office of the State Auditor, New Hampshire Child and Family Service, New Hampshire Liquor Division, and several state-based health insurance exchanges.

Budget

HOURLY RATES

In the table below, we have provided a list of our hourly rates by project personnel for work through federal fiscal year 2021. BerryDunn does not charge for time spent traveling, so these costs reflect only the time BerryDunn team members will be working on PRMP’s project.

Project Role	Hourly Rate*
Principal	\$405
Senior Manager	\$340
Manager	\$300
Senior Consultant	\$275
Consultant	\$185
Quality Assurance/Paraprofessional	\$165

**All hourly rates include estimated travel expenses based on BerryDunn’s travel assumptions. BerryDunn will work with PRMP to confirm travel expectations*

**Actuarial Rates have not been included but are available should PRMP require.*

**Rates are for FFY 2021 and subject to change thereafter.*

ESTIMATED BUDGET

BerryDunn understands that implementing new laws means interpreting what Congress wrote and making it work for you. This means taking a law that at times is not clear and finding solutions. Missing clarity also means it is hard to define a comprehensive task list and price. Based on the available information provided in the RFQ, BerryDunn estimated a fee for performing this work of **\$1,312,280**. BerryDunn anticipates that as work progresses and more information is analyzed and becomes available, this estimate may change. BerryDunn will only charge for the hours of work provided. The Table below provides PRMP with a breakdown by task. This estimated price includes our understanding of Puerto Rico’s taxes based on our existing work with PRMP and travel expenses based on our estimates of necessary on-site time.


We will hold prices, terms, and conditions firm for at least 90 days.

Task	Price
Task 1: Program Integrity	\$21,905
Task 2: PERM and Task 4: MEQC Audit	\$202,855
Task 3: Contracting Reform	\$109,515
Task 4: MEQC Audit	See Task 2

Task	Price
Task 5: Treatment of Funding under Section 1935(e)	\$129,905
Task 6: Annual Report	\$299,160
Task 7: Report on Contracting Oversight and Approval	\$62,740
Task 8: Audits of Managed Care Payments	\$92,870
Task 9: System for Funding Tracking	\$71,600
Task 10: CMS-64 Reporting	\$41,515
Task 11: State Plan Documentation	\$63,335
Task 12: Scorecard Reporting	\$199,650
Task 13: Policy	\$17,230
Total Estimate:	\$1,312,280

Project References

Below BerryDunn lists our references of prior work performed with other states on CMS, HHS, or Congress-related work.

West Virginia Bureau for Medical Services Medicaid Agency Project Management Services	
Client Contact Information	<p>Ms. Cynthia Beane, Commissioner West Virginia DHHR 350 Capital Street Charleston, WV 25301 304-356-4907 (office phone) cynthia.e.beane@wv.gov</p> 
Project Background	<p>In 2008, BerryDunn was hired to provide project management for West Virginia's MMIS re-procurement and design, development, and implementation. Over the course of our engagement, BerryDunn has served as a trusted advisor and an extension of the State's team by providing project management, business and technical analysis, policy analysis, and health and human services subject matter expertise to meet the Bureau for Medical Services' (BMS') evolving project needs.</p>
BerryDunn's Solution	<p>BerryDunn has assisted BMS with the following efforts, among others:</p> <ul style="list-style-type: none"> MITA State Self-Assessment (2.0 and 3.0) Development of MMIS business and technical requirements, procurement strategy, RFP, and I-APD Project management for MMIS re-procurement Systems planning, procurement support, and project management for Data Warehouse/Decision Support System (DW/DSS) Project support for the Eligibility & Enrollment Modernization project Project management for the MMIS 5010 upgrade Project management and implementation support for ICD-10 Project management for West Virginia's Health IT initiatives, including eligibility expansion of the Medicaid population and coordination with the State's Health Benefit Exchange ACA/healthcare reform planning, policy analysis, and implementation Development and implementation of a Project Management Office Development of rate setting methodology for subset of the State's behavioral health services
Project Outcomes	<p>With BerryDunn serving as the project management vendor, the MMIS went live on time and on budget in January 2016, without a single change order. Additionally, BerryDunn successfully supported West Virginia Medicaid through three CMS certification gate reviews. The State received CMS certification of the MMIS in October 2016.</p>
Key Staff	<p>BerryDunn maintains a fully staffed office in Charleston, WV.</p>
Project Dates	<p>04/2008 to present</p>
Vermont Department of Vermont Health Access (DVHA) Vermont Health Connect Financial and Programmatic Audit	
Contact Information	<p>Ms. Anne Petrow Program Compliance & Oversight Director/Compliance Officer Vermont DHVA 280 State Drive Waterbury, VT 05671 802-585-0276 anne.petrow@vermont.gov</p>

Project Background	<p>BerryDunn is performing programmatic and financial audits of the Vermont Health Connect (VHC). The Department of Vermont Health Access sought an independent examination of VHC's compliance with the federal government regulations for state HIXs and Qualified Health Plan (QHP) issuers for services rendered as set forth in 45 CFR 155.</p> <p>This audit meets the requirements of the CMS final rule (9957-F) and 45 CFR 155.1200, Exchange Establishment Standards and Other Related Standards under the ACA, and is being conducted under the professional rules and GAGAS.</p>
BerryDunn's Solution	<p>Our audit approach includes examination of the full program integrity life cycle—from reviewing internal controls and processes to promote effectiveness, efficiency, integrity, transparency, and accountability, to assessing monitoring and reporting activities and sampling the actual performance of and adherence to established controls. Our audit approach incorporates review of program and system data and documentation, as well as in-person interviews to review and observe program processes in real-time.</p> <p>We reviewed processes and procedures, read pertinent documents, observed operations, conducted sample testing, and interviewed staff to determine whether VHC was in material compliance with 45 CFR 155.</p>
Key Staff	Bill Brown, Yoko McCarthy, Vanessa Cayer, Colin Butterazzi
Project Dates	2016 to present
Minnesota Health Benefit Exchange (MNSure) Programmatic Audit	
Contact Information	<p>Mr. John Nyanjom Compliance and Integrity Program Manager Minnesota Health Benefit Exchange (MNSure) 81 E. 7th St., Suite 300 St. Paul, MN 55104 651-539-1354 john.nyanjom@state.mn.us</p>
Project Background	<p>Pursuant to the requirements under 45 CFR 155.1200, we completed a programmatic audit of MNSure, the State-Based Marketplace for the State of Minnesota. We conducted an assessment of MNSure's compliance with the program requirements under 45 CFR 155. We conducted our audit in accordance with GAGAS and the standards applicable to financial audits contained in Government Auditing Standards, issued by the Comptroller General of the United States.</p>
BerryDunn's Solution	<p>We reviewed processes and procedures, read pertinent documents, and performed inquiries, observations, testing, and staff interviews to determine whether MNSure is in material compliance with 45 CFR 155. This included performing site visits and walkthroughs of MNSure's Contact Center, performing a site visit of the agency that operates the Navigator and Certified Application Counselor program, and selecting a sample of cases to test eligibility, verification, and enrollment processes and procedures; and a sample of appeals to assess their compliance with the requirements under 45 CFR 155.</p>
Key Staff	Bill Brown, Yoko McCarthy, Vanessa Cayer
Project Dates	2016 to present
Alaska Division of Legislative Audit Examination and Redetermination of Eligibility for Medicaid and CHIP	
Contact Information	<p>Ms. Eileen Donahue, CPA Audit Manager Alaska Division of Legislative Audit 333 Willoughby Ave., 6th floor Juneau, AK 99811 907-465-1079 Eileen.Donahue@akleg.gov</p>

Project Background	<p>The Alaska Division of Legislative Audit (DLA) contracted with BerryDunn in 2019 to conduct an examination and redetermination of eligibility for a statistically valid sample of Medicaid and CHIP beneficiaries for the period from July 1, 2018 through March 31, 2019.</p> <p>The focus of our review was to address the following questions provided by DLA:</p> <ul style="list-style-type: none"> • Was eligibility determined accurately in accordance with federal and State law? If not, what specific law was not followed and why (if identifiable)? • Was eligibility determined timely in accordance with federal and State law? If not, why and how long was the delay?
BerryDunn’s Solution	<p>BerryDunn has completed the review for compliance with federal regulations, state laws and other state requirements applicable to each program for 190 beneficiaries pre-selected by DLA.</p> <p>For each sampled beneficiary, BerryDunn identified the earliest and latest dates the beneficiary received services that resulted in payment paid during the period identified above. The review encompassed the most recent DPA determination made prior to the earliest date of service the beneficiary received benefits, as well as all DPA redeterminations or actions to support all benefits payments taken through the latest date of service.</p> <p>The review of 190 sampled Medicaid/CHIP beneficiaries resulted in a total review of 407 eligibility determinations that supported the paid benefits in the scope for the beneficiaries. In addition, we tested the accuracy of notices sent to the sampled beneficiaries.</p> <p>BerryDunn’s report included, but was not limited to:</p> <ul style="list-style-type: none"> • Overall results of our reviews of 407 eligibility determinations • Detailed explanation of each error we cited • Additional observations that we believed would be beneficial for the state to consider improving, and • Recommendations of recognized best practices that would help the state reduce the number of eligibility errors.
Key Staff	<p>Bill Brown, Yoko McCarthy, Christy Schilling</p>
Project Dates	<p>2018 to present</p>

ADDITIONAL PROJECT REFERENCE

<p>UPMC Insurances Services Division</p> <p>PCORI Study of Behavioral Health Homes for Medicaid Managed Care Members with Severe Mental Illness</p>	<p>Dr. James Schuster, MD, MBA</p> <p>VP BH Integration & CMO Behavioral & Medicaid Services UPMC Insurances Services Division Pittsburgh, PA 412-454-6104 schusterjm@ccbh.com</p>
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