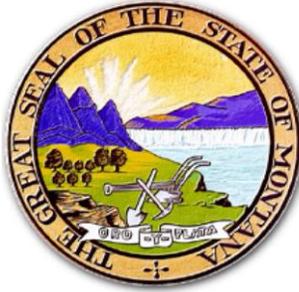


*Deliverable to:*

Montana Department of Public Health and  
Human Services



Independent Verification and Validation (IV&V)  
Services for the Montana Medicaid Management  
Information System (MMIS)

Monthly Status Report

August 20, 2014

**Public Knowledge LLC**

Management Consultants

1911 SW Campus Drive, #457  
Federal Way, WA 98023

Contact:

Rhonda Brinkoeter  
[rbrinkoeter@pubknow.com](mailto:rbrinkoeter@pubknow.com)  
720.206.9777  
[www.pubknow.com](http://www.pubknow.com)

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# 1 - MMIS Project Quality

## 1.1 Project Summary

<b>Current Phase:</b>	Requirements Analysis/Iterative Design/Development																																																																				
<b>Most Recent Accomplishment:</b>	Conducted several reviews of the re-planned work plan earned value metrics and participated in review meetings with Xerox; participated in and scribed solution presentation concept review sessions, weeks of 7/21/14, 7/28/14, 8/4/14, 8/11/14 and 8/18/14.																																																																				
<b>Next Major Milestone:</b>	Reports Complete for Metrics – 10/3/14																																																																				
<b>Next Payment Milestone:</b>	Benefit Plan – 11/16/15																																																																				
<b>Biggest Project Challenges:</b>	<ul style="list-style-type: none"> <li>• Quality issues with MT MMIS design sessions</li> <li>• Large number of Xerox action items not addressed</li> <li>• Gap quality, tracking, design session gap process concerns, and unresolved out of scope gap concerns</li> <li>• Attrition of Xerox project staff (14 staff in last 6 months)</li> <li>• Incorrect project reporting metrics, including issues in with base work and base cost in the re-planned work plan</li> </ul>																																																																				
<b>Status Overview</b>	<p><b>Sprint 7</b> – Start August 6 / Finish September 2. Functional Areas: Provider, Waiver, EHR/PHR, Contact Management, Service Auth, Claims Adjudication, Benefit Plan, Web Portal.</p> <p><b>Daikibo Methodology</b> –Design sessions under this new approach began on April 23, 2014. PK has developed a survey for DPHHS BA/PMs and DPHHS SMEs to monitor the progress and quality of the design sessions. Survey results are provided to DPHHS and Xerox on a weekly basis. See below for the current BA/PM survey results. There was no SME session last held week, so no SME session results are reported this week.</p> <div style="text-align: center;"> <table border="1"> <caption>BA PM Survey - Overall Data</caption> <thead> <tr> <th>Date</th> <th>Meetings</th> <th>Participation</th> <th>Progress</th> </tr> </thead> <tbody> <tr><td>4/29/14</td><td>65</td><td>55</td><td>50</td></tr> <tr><td>5/6/14</td><td>60</td><td>55</td><td>50</td></tr> <tr><td>5/13/14</td><td>60</td><td>55</td><td>50</td></tr> <tr><td>5/20/14</td><td>55</td><td>60</td><td>50</td></tr> <tr><td>5/27/14</td><td>65</td><td>60</td><td>55</td></tr> <tr><td>6/3/14</td><td>60</td><td>65</td><td>55</td></tr> <tr><td>6/10/14</td><td>60</td><td>60</td><td>55</td></tr> <tr><td>6/17/14</td><td>65</td><td>65</td><td>55</td></tr> <tr><td>6/24/14</td><td>70</td><td>70</td><td>55</td></tr> <tr><td>7/1/14</td><td>65</td><td>65</td><td>55</td></tr> <tr><td>7/8/14</td><td>65</td><td>60</td><td>50</td></tr> <tr><td>7/15/14</td><td>60</td><td>55</td><td>40</td></tr> <tr><td>7/22/14</td><td>65</td><td>55</td><td>45</td></tr> <tr><td>7/29/14</td><td>55</td><td>55</td><td>45</td></tr> <tr><td>8/5/14</td><td>65</td><td>60</td><td>45</td></tr> <tr><td>8/12/14</td><td>60</td><td>65</td><td>45</td></tr> </tbody> </table> </div> <p><b>Amendment 5</b> – This amendment will address, at a minimum, the re-planned Xerox work plan, the new payment milestones, liquidated damages, Line of Business, Architecture, and Oracle licenses. As of July 18, 2014, DPHHS and Xerox have reached agreement on Contract Amendment #5. This amendment was formally submitted to CMS on August 8, 2014.</p>	Date	Meetings	Participation	Progress	4/29/14	65	55	50	5/6/14	60	55	50	5/13/14	60	55	50	5/20/14	55	60	50	5/27/14	65	60	55	6/3/14	60	65	55	6/10/14	60	60	55	6/17/14	65	65	55	6/24/14	70	70	55	7/1/14	65	65	55	7/8/14	65	60	50	7/15/14	60	55	40	7/22/14	65	55	45	7/29/14	55	55	45	8/5/14	65	60	45	8/12/14	60	65	45
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**Staffing Changes** – The subcontract between Xerox and Cognizant was executed in June 2013. Since the contract execution and the rebadging of Xerox staff to Cognizant, there has been attrition of key project staff. The following 34 Xerox project staff members have resigned since July 2013. These staff are no longer working on the Montana MMIS DDI project:

- Management and key/named staff – Tom Olsen, Tony Franklin, Kimberly Price, Kevin McFarling, Alan Bratton, Phil Messina, Heather Monday, Neil Galloway, Chris Bertelsen, Rachelle McCann, Jennifer St. Clair (Director of Product Technologies), Goodney Zapp, Debbie Rieger, Kathy Olbekson
- Project Leads – Jean McCarthy, Bill Conklin, Julie Allen
- Functional Area Leads – Jean Beatty, Kristy Gilreath, Tracy Byrd, Jessica Pickering, Walton Andrews, LaChelle Heard, Wendi Caldwell,
- Functional Area Business Analysts – Kris Feliciano, Barbara Harkin, Zelda Thunderbird, Joel Getz
- Project Support Staff – Laura Griggs (Health Enterprise expert), Paul Lefever (testing analyst), and 3 key architecture staff, Mary Bomar (scribe)

**Project Status/Xerox Performance Indicator Panel**

**Overall:**  yellow

NOTE: The overall project status is yellow due to quality issues with MT MMIS design sessions, the large number of Xerox action items not addressed, gap tracking and design session gap process concerns, unresolved out of scope gaps, incorrect project reporting metrics, and the attrition of Xerox staff.

**Schedule:**  green

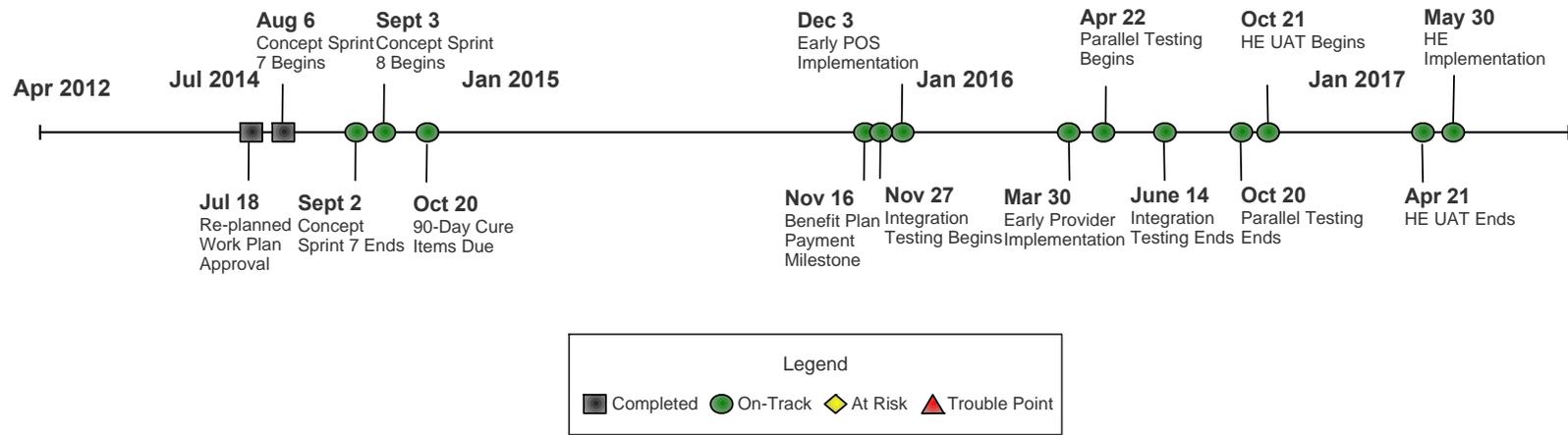
**Scope:**  red

**Resources:**  green

**Performance Indicator Panel Key**

- Green: no risk identified risk
- Yellow: identified risk – must be actively managed
- Red: identified problem – requires mitigation

**Project Timeline**



**Overdue Deliverables and Interim Deliverables**

None

*1.2 Recommended Priorities for Next Reporting Period*

Recommended Priorities	Responsible Party	Risk Level

**Risk Level Key:**

 Green: no risk identified risk	 Yellow: identified risk – must be actively managed	 Red: identified problem – requires mitigation
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### 1.3 Issues for Management Attention

The following table presents the most critical issues on the project. Refer to the project issue log in the DPHHS SharePoint for more detailed information about project issues.

Issue	What's Been Done	What's Still Needed
<i>1) Large number of Xerox Action Items not addressed</i>		
<ul style="list-style-type: none"> <li>- Xerox currently has 1,091 open action items, and 1,049 of these action items are overdue</li> <li>- 988 of the Xerox open action items have been open for more than 12 weeks</li> <li>- Xerox currently has 1,262 completed (not closed) action items</li> <li>- Once open action items have been answered by Xerox, the responses may generate gaps</li> <li>- All action items in a completed status will need to be reviewed with DPHHS staff to determine if the response fully addresses the DPHHS inquiry, before they can be closed</li> <li>- Numerous action items have been generated due to HE experts not being present in design sessions, conversion walkthroughs, etc.</li> </ul>	<ul style="list-style-type: none"> <li>- Action item metrics are presented to Xerox on a weekly basis</li> <li>- Xerox delivered an Action Item Corrective Action and Mitigation Plan on 8/8/14</li> <li>- DPHHS delivered comments on this plan to Xerox on 8/12/14</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to re-deliver the Action Item Corrective Action and Mitigation Plan, with DPHHS comments incorporated</li> </ul>
<i>2) Quality issues with MT MMIS design sessions</i>		
<ul style="list-style-type: none"> <li>- Lack of preparation by Xerox staff</li> <li>- Failure to follow overall design processes, including processes for AIs, BRs, Gaps, etc.</li> <li>- Inability to demonstrate Health Enterprise</li> <li>- Inconsistent participation by Health Enterprise experts</li> <li>- Failure to complete assigned prerequisites</li> </ul>	<ul style="list-style-type: none"> <li>- An issue has been entered in the Xerox SharePoint</li> <li>- This is discussed on a weekly basis in the Xerox Weekly DDI PM meeting</li> <li>- PK developed a new BA/PM and</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to conduct training for staff</li> <li>- Survey results are delivered to Xerox on a weekly basis</li> <li>- Xerox to improve velocity on ready for development gaps/use cases for presentation in SME sessions</li> </ul>

Issue	What's Been Done	What's Still Needed
<ul style="list-style-type: none"> <li>- Poor facilitation of sessions</li> <li>- Pace/flow of sessions should be optimized to make better use of DPHHS SME's time</li> <li>- Need to improve Xerox BA coordination with DPHHS BAs prior to the session</li> <li>- Failure to clearly state the desired outcome of the session</li> <li>- Inability to accurately estimate the planned duration for the material being presented</li> <li>- Presenters/leads are not familiar with the MMIS RFP and Xerox response</li> <li>- Scribes should be onsite for the sessions so they can hear all discussion in the room and the notes can be displayed</li> <li>- Some material presented in SME sessions has not been in a ready for development status</li> <li>- Many of the Xerox POPs, Functional Area leads and HE Experts are not on site for the concept sessions</li> <li>- Xerox has experienced delays in updating documentation for the active functional area sprints</li> <li>- Xerox has experienced delays in incorporating proposed solutions to the prototype</li> <li>- The Service Auth design session are disorganized and progress is slow</li> <li>- The Claims Adjudication documentation is not being updated before the sessions, the DPHHS lead is updating the documentation</li> <li>- Waiver sessions are ending early because Xerox is not preparing enough material to fill</li> </ul>	<ul style="list-style-type: none"> <li>SME survey to track the progress and quality of the design session, beginning 4/23/14</li> <li>- Survey results are provided to Xerox on a weekly basis</li> <li>- SME meeting frequency has been reduced to bi-weekly</li> <li>- Xerox has restructured the Daikibo solution review meetings to be 2.5 hours long each</li> <li>- Stand-up meetings and POP meetings were combined with the solution presentation meetings</li> </ul>	

Issue	What's Been Done	What's Still Needed
the full 2.5 hour session		
<i>3) Gap tracking and process management concerns</i>		
<ul style="list-style-type: none"> <li>- BAs and PMs are unable to locate many Gaps in the Consolidated RSD and Consolidated RTM</li> <li>- There are 155 gaps in DOORS that have not been mapped to a UI specification</li> <li>- MC29, MC30, and MC31 have been in a "New" status since February 2014</li> </ul>	<ul style="list-style-type: none"> <li>- An Issue has been entered in the Xerox SharePoint Issues List</li> <li>- 148 requirements remain for initial discussion in sessions for potential gap identification</li> <li>- Xerox delivered updated information on 14 outstanding Remaining Requirements on 7/23/14</li> <li>- DPHHS/PK responded on 8/6/14, noting that only 5 of the 14 requirements were actually resolved</li> <li>- Xerox re-delivered their remaining requirements update on 8/15/14</li> </ul>	<ul style="list-style-type: none"> <li>- An Issue has been entered in the Xerox SharePoint Issues List</li> <li>- 148 requirements remain for initial discussion in sessions for potential gap identification</li> <li>- Xerox to complete review and validation of all unresolved requirements identified in the Remaining Requirements report</li> <li>- PK requested that these requirements be prioritized on design session agendas, as discussion/demonstration of these requirements may generate gaps</li> <li>- DPHHS/PK to deliver review comments to Xerox on the remaining requirements update delivered on 8/15/14</li> </ul>
<i>4) Lack of availability of Health Enterprise (HE) Experts for collaboration sessions</i>		
<ul style="list-style-type: none"> <li>- When the new concept session process was implemented, Xerox committed that they would have a HE expert present in each session</li> <li>- Lack of HE knowledge in sessions generates numerous action items for Xerox</li> <li>- Without proper knowledge of the HE system,</li> </ul>	<ul style="list-style-type: none"> <li>- An issue has been entered in the Xerox SharePoint list</li> <li>- DPHHS has requested that an HE SME be present for each collaboration and design session</li> <li>- Xerox provides a spreadsheet, identifying the HE Expert for each</li> </ul>	<ul style="list-style-type: none"> <li>- Knowledgeable Xerox Health Enterprise experts on site for each collaboration and design session</li> <li>- Xerox expert attendance and participation will be evaluated for each session with the concept session survey</li> </ul>

Issue	What's Been Done	What's Still Needed
<p>gaps cannot be properly identified</p> <ul style="list-style-type: none"> <li>- Xerox has made improvements that have partially addressed this issue, however HE Expert support continues to be inconsistent</li> <li>- This issue will be kept open and monitored closely, on a daily basis</li> <li>- Tim Phelon is the lead and the HE Expert for Member, but does not have extensive HE knowledge</li> <li>- In Reference, there are three experts that rotate in and out to support the sessions. There is not continuity and each expert for a given week is not up to speed on what happened the previous week. Mary Lynn and Robin are not listed as experts on the MT SME Coverage spreadsheet.</li> <li>- At times HE Experts leave the session meetings early, without announcing their departure</li> <li>- Sprint agendas which identify the HE Expert are for the whole month, so you don't always know which Expert is going to be on the phone supporting a session on a particular day</li> </ul>	<p>functional area, on a weekly basis</p> <ul style="list-style-type: none"> <li>- This issue is reviewed weekly during the Xerox Weekly DDI PM meeting</li> </ul>	<ul style="list-style-type: none"> <li>- Results of the evaluation will be reported to Xerox on a weekly basis</li> <li>- Xerox to supplement Tim Phelon with a Health Enterprise Member Expert.</li> <li>- Identify a single HE Expert for the Reference functional area</li> <li>- Attendees should be notified at the beginning of a meeting if an HE Expert will need to drop off of the call early</li> <li>- If the expert changes for a functional area, based on the topic being discussed, Xerox should communicate the change to DPHHS</li> </ul>
<p><i>5) System Architecture requirements for Commercial off-the-Shelf (COTS) products</i></p>		
<ul style="list-style-type: none"> <li>- Xerox is of the opinion that System Architecture requirements do not apply to the COTS products proposed to meet DPHHS RFP requirements</li> <li>- There is no stated exclusion in the RFP for</li> </ul>	<ul style="list-style-type: none"> <li>- DPHHS delivered a matrix outlining the COTS products that are part of the DDI, and the system architecture requirements in question on 7/29/13</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to re-deliver the COTS Matrix with updates based on discussions in the COTS Matrix meetings</li> </ul>

Issue	What's Been Done	What's Still Needed
<ul style="list-style-type: none"> <li>- products that Xerox has chosen to use to meet RFP requirements</li> <li>- Xerox delivered the populated matrix to DPHHS on 6/7/13, however population of data for three of the COTS products is incomplete</li> <li>- Xerox delivered an updated matrix to DPHHS on 6/25/13, however the population of data for ImpactPro is not complete</li> <li>- DPHHS conducted and initial internal review of the populated matrix on 6/25/13</li> <li>- DPHHS delivered review comments to Xerox on the populated COTS matrix on 7/29/13</li> <li>- Xerox delivered an updated matrix, including the population of ImpactPro data</li> <li>- Xerox to respond to the review comments submitted by DPHHS on 7/29/13</li> <li>- Jennifer St. Clair is scheduled to have her review and comments on the COTS Matrix complete by 9/20/13</li> <li>- The Xerox review and comment date has been changed to 10/15/13</li> <li>- The Xerox review and comment date has been changed to 11/15/13</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox delivered their comments on the DPHHS COTS Matrix on 11/21/13</li> <li>- DPHHS and Xerox conducted meetings to review the populated matrix and Xerox comments on 1/17/14 and 1/21/14</li> <li>- DPHHS provided feedback on identified discussion items on 1/30/14</li> <li>- DPHHS provided additional feedback to Xerox on 2/9/14</li> <li>- DPHHS re-delivered the feedback they had originally provided in February 2014, on 7/25/14</li> </ul>	
<p>6) Limited DPHHS/PK access to JIRA, Sonar, RQM, and CQ</p>		
<ul style="list-style-type: none"> <li>- Access to these tools is needed for DPHHS/PK to have visibility to development, testing progress and defect identification and resolution</li> <li>- Until expanded access is provided, PK has</li> </ul>	<ul style="list-style-type: none"> <li>- RQM training was provided on 5/29/13</li> <li>- Access to JIRA was provided to six DPHHS/PK staff on 1/31/14</li> <li>- A request for JIRA access for four</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to complete the re-configuration of JIRA in order to provide the needed metrics for project reporting</li> <li>- Xerox to provide access to the</li> </ul>

Issue	What's Been Done	What's Still Needed
<p>requested that Xerox provide defect metrics, per the system test plan</p> <ul style="list-style-type: none"> <li>- Access to RQM was provided for some users on 4/25/13, and RQM training was provided on 5/29/13</li> <li>- Adequate content for backlog management across the entire system does not appear to exist</li> <li>- Access to the comprehensive HE backlog is not currently available</li> <li>- Needed metrics for reporting on JIRA task progress have not yet been configured</li> </ul>	<p>additional DPHHS/PK staff was submitted by DPHHS on 2/3/14</p> <ul style="list-style-type: none"> <li>- JIRA training for DPHHS/PK staff was conducted on 2/20/14</li> <li>- State temp IDs have been set up and appropriate access has been granted</li> <li>- Tim, Sibyl and Rhonda have access to JIRA and appropriate access has been granted</li> <li>- An additional JIRA training was conducted on 5/20/14</li> <li>- DPHHS delivered an updated version of the Client Access Tools spreadsheet to Xerox on 8/6/14</li> </ul>	<p>additional staff and trouble-shoot the access issues identified in the Client Access Tools spreadsheet on 8/6/14</p> <ul style="list-style-type: none"> <li>- Xerox will have 90 days from the effective date of contract amendment #5 to develop and deploy comprehensive project management and sprint reporting, metrics, use case dependencies, and resource allocation reporting against Microsoft Project work plan and the JIRA repository. The project management reports must be on-line real-time reports that are accessible by DPHHS.</li> </ul>
<p><i>7) Attrition of Xerox staff transitioned to Cognizant</i></p>		
<ul style="list-style-type: none"> <li>- On 7/18/13 Xerox announced that staff hired to work on the Montana DDI project, that did not previously work for the fiscal agent, will be transitioned to Cognizant employees effective 8/1/13</li> <li>- On 7/25/13 Xerox announced that staff hired to work on the Montana DDI project, that previously worked for the fiscal agent, will be transitioned to Cognizant employees effective 10/1/13</li> <li>- There is a risk that essential Montana DDI team members will leave Xerox due to this transition</li> </ul>	<ul style="list-style-type: none"> <li>- An Issue has been entered in the Xerox SharePoint Issues List</li> <li>- Xerox submitted a PM Transition plan to DPHHS on 8/16/13</li> <li>- DPHHS commented on, and did not accept the proposed plan, on 8/21/13</li> <li>- The risk status was updated to "Occurring" on 9/23/13</li> <li>- Xerox presented a new project staffing plan on 10/11/13, but has not formally submitted this plan</li> <li>- Xerox formally submitted their new</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to identify new leads for and Financial and Claims Payment, and provide training and background information on the functional areas progress to date</li> <li>- Xerox to identify a new Training lead</li> </ul>

Issue	What's Been Done	What's Still Needed
<ul style="list-style-type: none"> <li>- This transition should exclude named project staff, however Chris Bertelsen has been transitioned to Cognizant</li> <li>- Tony Franklin (DDI Manager) and Tom Olsen (PMO Project Manager) have resigned from Xerox</li> <li>- Kimberly Price (DDI Manager) has resigned from Xerox</li> <li>- Phil Messina (Interfaces Functional Lead), Kris Feliciano (DSS Functional Business Analyst) and Heather Monday (DSS Lead) have resigned from Xerox</li> <li>- Shiboo, Madav, and Srini (Architecture staff) have resigned from Xerox</li> <li>- Kevin McFarling (Executive Management) has resigned from Xerox</li> <li>- Jake Oner is acting as the interim Implementation Manager on the project</li> <li>- Jean Beatty (TPL Functional Lead) has resigned from Xerox</li> <li>- Kristy Gilreath (Financial &amp; Claims Payment Functional Team Lead) has resigned from Xerox</li> <li>- Jean McCarthy (Requirements Manager) and Bill Conklin (Functional Product Lead) have resigned from Xerox</li> <li>- Tracy Byrd (Provider Functional Lead) left the MT project in October 2013</li> <li>- Neil Galloway (Data Conversion &amp; Interfaces Manager) retired, effective 12/31/13</li> <li>- Jessica Pickering (Web Portal and Architecture</li> </ul>	<ul style="list-style-type: none"> <li>project staffing plan to DPHHS on 12/17/13</li> <li>- DPHHS requested additional information from Xerox on their staffing proposal on 1/6/14</li> <li>- Xerox staff rebadged from Xerox to Cognizant on 1/1/14 are Shellie McCann, David Copenhaver, Scott Patzer, Mayank Sharma, Neil Galloway, Lisa Stimatz, and Craig Krause</li> <li>- DPHHS submitted a formal response to the Xerox project staffing plan on 1/15/14</li> <li>- Xerox submitted a staffing proposal to replace the PM Analyst and Conversion Manager named positions on 2/3/14</li> <li>- DPHHS rejected the staff proposed for these PM Analyst and Conversion Manager named positions on 2/10/14</li> <li>- Xerox submitted a staffing proposal to replace the PM Analyst and Conversion Manager named positions on 3/3/14</li> <li>- DPHHS approved the Xerox proposed resources for the PM Analyst and Conversion Manager named positions on 3/7/14</li> <li>- Xerox proposed Chris Bertelsen for</li> </ul>	

Issue	What's Been Done	What's Still Needed
<ul style="list-style-type: none"> <li>- Functional Lead) resigned from Xerox, effective 1/3/14</li> <li>- Julie Allen (Functional Product Lead) resigned from Xerox, effective 2/5/14</li> <li>- Paul Lefever (Testing Analyst) resigned from Xerox, effective 1/27/14</li> <li>- Barbara Harkin (Claims Functional Business Analyst) is being reassigned to another division in Xerox, effective 2/24/14</li> <li>- Zelda Thunderbird (Claims Functional Business Analyst) resigned from Xerox, effective 2/14/14</li> <li>- Joel Goetz (Web Portal and Architecture Functional Business Analyst) has resigned from Xerox, effective 4/4/14</li> <li>- Rachelle McCann (PMO) has resigned from Xerox, effective 4/11/14</li> <li>- Laura Griggs (Provider Expert) has resigned from Xerox, effective 5/2/14</li> <li>- Jennifer St. Clair (Director of Product Technologies) has resigned from Xerox, effective 5/23/14</li> <li>- Walton Andrews (Financial Functional Lead) has resigned from Xerox, effective 6/4/14</li> <li>- Mary Bomar (Scribe) has resigned from Xerox, effective 7/3/14</li> <li>- LaChelle Heard (Member Functional Lead) has resigned from Xerox, effective 6/30/14</li> <li>- Wendi Caldwell (Reference Functional Lead) has resigned from Xerox, effective 6/30/14</li> <li>- Goodney Zapp (Cognizant PM) is no longer</li> </ul>	<ul style="list-style-type: none"> <li>- the open PM Analyst position on 5/6/14</li> <li>- DPHHS approved Chris Bertelsen as the PM Analyst on 5/16/14</li> </ul>	

Issue	What's Been Done	What's Still Needed
<p>working on the MT MMIS project, effective 7/11/14</p> <ul style="list-style-type: none"> <li>- Debbie Rieger (PMO Project Manager) resigned from Xerox, effective 7/25/14</li> <li>- Kathy Olbekson (DSS Lead) resigned from Xerox, effective 8/13/14</li> </ul>		
<i>8) Business Rules Process</i>		
<ul style="list-style-type: none"> <li>- Xerox to establish a process for review of business rules, including business rules selected by DPHHS for externalization, during concept review sessions</li> </ul>	<ul style="list-style-type: none"> <li>- Issue entered in the Xerox SharePoint</li> <li>- Xerox provided the updated master business rules spreadsheet, including the column indicating where each business rule is housed, on 4/16/14</li> <li>- DPHHS provided a spreadsheet to Xerox containing business rules selected for externalization on 5/16/14</li> <li>- An architecture meeting with DPHHS and Xerox was conducted on 7/10/14</li> <li>- Xerox delivered their proposed Business Rules process on 8/18/14</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to refine the business rules process and ensure that all functional area teams are trained on the process and have access to documentation</li> <li>- Xerox to provide the list of business rules selected for externalization to the functional area leads for review in concept sessions</li> <li>- Xerox to review and respond to DPHHS request for business rules externalization</li> <li>- DPHHS to respond to the Xerox proposed Business Rules process</li> </ul>
<i>9) Personal transportation claims approach has not been defined</i>		
<ul style="list-style-type: none"> <li>- It was determined that the initial Xerox proposal to address personal transportation claims would not meet the DPHHS business needs</li> <li>- Xerox plans to present this solution in a future sprint</li> </ul>	<ul style="list-style-type: none"> <li>- DPHHS has requested that Xerox present a solution for how these claims will be handled in HE</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to propose a solution which meets DPHHS requirements and business need</li> </ul>

Issue	What's Been Done	What's Still Needed
<p><i>10) Xerox is not following the escalation procedure outlined in the Issue Management Plan</i></p> <ul style="list-style-type: none"> <li>- Critical issues with due dates that have passed without resolution should be escalated per the Escalation Procedure</li> <li>- The Xerox Issue Management Plan outlines the escalation procedure</li> </ul>	<ul style="list-style-type: none"> <li>- This was discussed with Xerox during the 8/14/14 Governance meeting</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to follow the approved Issue Management Plan</li> <li>- Xerox to propose corrective action plans for all critical issues</li> </ul>
<p><i>11) Xerox is not developing and implementing risk mitigation and contingency plans for identified risks</i></p> <ul style="list-style-type: none"> <li>- Identified risks do not have appropriate risk mitigation and contingency plans</li> <li>- The Xerox Risk Management Plan outlines the escalation procedure</li> </ul>	<ul style="list-style-type: none"> <li>- This was discussed with Xerox during the 8/14/14 Governance meeting</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to propose risk mitigation and contingency plans for all critical risks</li> <li>- Xerox to follow the approved Risk Management Plan</li> </ul>
<p><i>12) Issues with Xerox reporting of Baseline Work and Baseline Cost in the approved re-planned project work plan</i></p> <ul style="list-style-type: none"> <li>- Xerox loaded the re-planned project work plan to a different tool than it was developed in, after the approval of the work plan</li> <li>- The use of this tool has caused changes to base work, baseline cost and baseline dates, which should never change</li> <li>- Xerox is experiencing issues with these values changing from week to week</li> <li>- Xerox is working with Microsoft to resolve the issues that they are experiencing</li> <li>- There are four outstanding PK status reports that can not be finalized until Xerox has resolved this issue</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox provided a an Excel workbook with all baseline values and must keep the MS Project plan in sync with these values</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to resolve the outstanding baseline work and cost issues</li> </ul>

Issue	What's Been Done	What's Still Needed
<i>13) Issues with the Xerox SPI calculation</i>		
<ul style="list-style-type: none"> <li>- The Xerox reported planned value in the Xerox weekly status reports vary greatly from the approved weekly planned value</li> <li>- This variance causes a large discrepancy in the Xerox reported SPI and PK manually calculated SPI (.975 vs. .75)</li> <li>- Xerox is currently researching the cause of this</li> <li>- The Xerox reported SPI is .975, which is "yellow" based on their status criteria metrics</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox was notified of this issue on 8/11/14</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to resolve the SPI calculation issues</li> </ul>

### 1.4 Risks for Management Attention

The following table summarizes the most important risks for the project along with recommended actions. Refer to the project risk log for more detailed information about project risks.

Risk	What's Been Done	Recommendation
<p>1) <i>There are currently 253 gaps in DOORS in a "Pending", "Out of Scope", "In Review", "PMO Review", "Discussion in Progress (DPHHS)", "Discussion in Progress (Xerox)", "DPHHS OOS Review", "New" or "CCB Governance Comm Review" status</i></p> <ul style="list-style-type: none"> <li>- Not all gaps have been entered in DOORS, so there may be additional pending gaps added in the future</li> <li>- It is a project risk to have this large number of gaps for which it is unknown whether they will proceed to development</li> <li>- This impacts design and planning for development and testing</li> </ul>	<ul style="list-style-type: none"> <li>- An Issue has been entered in the Xerox SharePoint Issues List</li> <li>- This risk is discussed weekly in both the Xerox Weekly Status meeting and the Weekly DDI PM meeting</li> <li>- Xerox delivered 23 out of scope gaps for DPHHS review on 3/8/13</li> <li>- DPHHS provided a written response to the Xerox out of scope gap spreadsheet on 3/29/13</li> <li>- Xerox delivered 19 out of scope gaps for DPHHS review on 4/5/13</li> <li>- DPHHS provided a written response to the Xerox out of scope gap spreadsheet on 4/12/13</li> <li>- Xerox delivered six out of scope gaps for DPHHS review on 4/17/13</li> <li>- DPHHS provided a written response to the Xerox out of scope gap spreadsheet on 4/25/13</li> <li>- Xerox delivered 46 out of scope gaps</li> </ul>	<ul style="list-style-type: none"> <li>- The remaining out of scope gaps should be reviewed by the Xerox product review board and delivered to DPHHS for review</li> <li>- Xerox to propose a plan to assess and address all remaining gaps categorized as OOS</li> </ul>

Risk	What's Been Done	Recommendation
	<p>for DPHHS review on 4/30/13</p> <ul style="list-style-type: none"> <li>- Xerox delivered 33 out of scope gaps on 5/3/13 for discussion in the meeting scheduled for 5/8/13</li> <li>- A meeting to discuss the DPHHS responses delivered on 3/29/13 (23) and 4/12/13 (19) to the out of scope gaps was held on 5/8/13, but there has been no resolution on the outstanding gaps</li> <li>- A gap scope review meeting with DPHHS/PK and Xerox was conducted on 5/28/13</li> <li>- A gap scope review meeting with DPHHS/PK and Xerox was conducted on 6/13/13</li> <li>- Internal DPHHS/PK meetings to review and comment on OOS gaps were conducted on 6/14/13 and 6/17/13</li> <li>- Project Governance - OOS Gap meetings with DPHHS, PK and Xerox were conducted on 6/26/13 and 7/11/13</li> <li>- An internal DPHHS/PK meeting to review and comment on OOS gaps was conducted on 7/15/13</li> <li>- Xerox delivered 72 out of scope gaps for DPHHS review on 7/27/13</li> <li>- DPHHS submitted comments to Xerox on the 72 out of scope gaps on 8/13/13</li> </ul>	

Risk	What's Been Done	Recommendation
	<ul style="list-style-type: none"> <li>- A OOS Gap project governance meeting was scheduled for 8/28/13, however this meeting was not conducted</li> <li>- An OOS governance meeting was held on 9/17/13, however OOS gaps were not discussed</li> <li>- On 9/12/13, Xerox requested a meeting to discuss the remaining requirements report and agree on requirement ownership</li> <li>- The remaining requirements report was discussed during the DDI PM meeting on 9/17/13</li> <li>- An OOS governance meeting was held on 9/17/13, however OOS gaps were not discussed</li> <li>- Xerox delivered an OOS gap spreadsheet, with 141 remaining OOS gaps for DPHHS review, on 9/18/13</li> <li>- DPHHS submitted a responses to a subset of the gaps that were missing requirements on 9/26/13 and 10/21/13</li> <li>- DPHHS submitted responses to the remaining out of scope gaps provided by Xerox on 10/25/13</li> <li>- Xerox conducted an MMIS DDI Governance – Out of Scope Gap meeting with DPHHS on 11/14/13</li> <li>- An OOS Gap Governance meeting was</li> </ul>	

Risk	What's Been Done	Recommendation
	<p>scheduled for 12/12/13, however OOS gaps were not discussed at this meeting</p> <ul style="list-style-type: none"> <li>- An OOS Gap Governance meeting was held on 1/23/14, however no OOS gaps were reviewed during this meeting</li> <li>- An OOS Gap Governance meeting was held on 3/13/14</li> <li>- Xerox delivered an OOS Gap Plan to DPHHS on 3/18/14</li> <li>- An OOS Gap Governance meeting was held on 4/10/14</li> <li>- Xerox conducted an evaluation of all gaps that they consider out of scope, to categorize and prioritize the gaps</li> <li>- The OOS gap meeting scheduled for 4/24/14 was canceled by Xerox</li> <li>- An OOS Gap Governance meeting was held on 5/23/14</li> <li>- The OOS gap meeting scheduled for 5/29/14 was canceled</li> <li>- The OOS gap meeting scheduled for 6/5/14 was canceled</li> <li>- The OOS gap meeting scheduled for 6/12/14 was canceled</li> <li>- The OOS gap meeting scheduled for 6/26/14 was canceled</li> <li>- The OOS gap meeting scheduled for 7/3/14 was canceled</li> <li>- An OOS Gap Governance meeting was</li> </ul>	

Risk	What's Been Done	Recommendation
	<p>held on 7/10/14</p> <ul style="list-style-type: none"> <li>- An OOS Gap Governance meeting was held on 7/24/14</li> <li>- The OOS gap meeting scheduled for 7/31/14 was canceled</li> <li>- An OOS Gap Governance meeting was held on 8/7/14</li> <li>- An OOS Gap Governance meeting was held on 8/14/14</li> </ul>	
<hr/>		
<p><i>2) Xerox is deferring unfinished sprint functionality to later sprints</i></p> <ul style="list-style-type: none"> <li>- Delays in the planning for and completion of functionality in sprints, is causing functionality to be deferred to later sprints</li> <li>- Sprint retrospectives indicate that gaps are being deferred to later sprints than originally planned</li> <li>- Xerox has not previously used the Agile methodology to implement an MMIS</li> <li>- Xerox moved many gaps and use cases from Sprint 6 to Sprint 7, as the work was not completed in Sprint 6</li> </ul>	<ul style="list-style-type: none"> <li>- An Issue has been entered in the Xerox SharePoint Issues List</li> </ul>	<ul style="list-style-type: none"> <li>- Monitor and discuss progress with Xerox often and adjust approach and processes as necessary</li> <li>- DPHHS and Xerox to Participate in Sprint Retrospectives</li> </ul>
<hr/>		
<p><i>3) Concerns with existing legacy data related to Provider that is either incomplete, inaccurate or not present in the legacy MMIS and may impact the MMIS DDI</i></p> <ul style="list-style-type: none"> <li>- Many Provider SSNs, affiliations, ownership, and service locations are either incomplete, inaccurate or not present in the legacy MMIS</li> <li>- SSN will be required for CMS certification of</li> </ul>	<ul style="list-style-type: none"> <li>- Internal DPHHS discussion was held on 7/8/13</li> <li>- DPHHS delivered a document to Xerox on 2/3/14, articulating their provider data concerns</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to complete design for their proposed solutions to the Provider data concern items</li> <li>- Xerox to provide information discussed in the Provider</li> </ul>

Risk	What's Been Done	Recommendation
<p>HE</p> <ul style="list-style-type: none"> <li>- There are many other missing provider data elements that will be essential for proper functionality of the HE system</li> </ul>	<ul style="list-style-type: none"> <li>- DPHHS and Xerox reviewed this document in the Provider Enrollment Data Collection meeting on 2/5/14</li> <li>- Xerox presented solutions to some of the DPHHS documented data concerns in last week's Provider Enrollment Data Collection meeting on 3/12/14</li> <li>- DPHHS provided feedback to the Xerox solutions presented in the Provider Enrollment Data Collection meeting on 3/12/14</li> <li>- Xerox presented solutions to some of the Provider data concern items in the 3/19/14 Provider Enrollment Data Collection meeting, however these solutions were not out of sync with previous discussions</li> <li>- Xerox presented solutions to the remainder of Provider data concern items in the 3/26/14 Provider Enrollment Data Collection meeting</li> </ul>	<p>Enrollment Data Collection meetings to the Provider Functional team, as this design will be addressed in the Provider Concept sessions</p> <ul style="list-style-type: none"> <li>- Xerox to provide a Provider Data/Revalidation demonstration to DPHHS</li> </ul>
<hr/>		
<p><i>4) There is not a clear vision and understanding by Xerox about how to implement workflow functionality in HE</i></p> <ul style="list-style-type: none"> <li>- Xerox frequently recommends "working reports" rather than creating a workflow to assign outstanding work</li> <li>- Workflows give both staff and supervisors the ability to quickly and easily identify the quantity and priority of outstanding work</li> </ul>	<ul style="list-style-type: none"> <li>- A risk has been entered in the Xerox SharePoint</li> <li>- Craig Krause attended XTCM workflow training</li> <li>- DPHHS has requested that a meeting between DPHHS and Xerox be</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to present a plan for inclusion of workflows for assigning and managing work in HE</li> <li>- Xerox to provide training to functional teams on workflows</li> <li>- Xerox to respond to the DPHHS</li> </ul>

Risk	What's Been Done	Recommendation
<ul style="list-style-type: none"> <li>- Functional areas don't have a clear understanding of how to utilize XTCM or contact management workflow functionality to assign work</li> </ul>	<ul style="list-style-type: none"> <li>conducted in advance of the 10/22/13 workflow session, so there is agreement on the objective in advance</li> <li>- The 10/22/13 workflow session was canceled when design sessions were halted</li> <li>- DPHHS compiled all occurrences of workflow requirements in the RFP</li> <li>- DPHHS compiled a list of all identified workflow gaps</li> <li>- The planned approach for workflows was discussed in a meeting with DPHHS and Xerox on 1/16/14</li> <li>- An architecture meeting was held on 2/18/14 where Xerox again asked DPHHS to explain the required workflow functionality, and questioned whether this gap functionality was in the scope of the RFP</li> <li>- Xerox delivered a process document and template for evaluation of workflow items identified in design sessions on 3/25/14</li> <li>- DPHHS has requested a specification for the XCM solution, as this will impact the previously proposed workflow process and template delivered by Xerox</li> <li>- Xerox delivered the XCM</li> </ul>	<p>workflow specification</p>

Risk	What's Been Done	Recommendation
	specification on 4/22/14 - Workflow meetings with DPHHS and Xerox were held on 7/29/14 and 7/30/14 - Internal DPHHS meetings to review the workflow spec with the DPHHS SMEs were held on 8/11/14 and 8/12/14 - DPHHS delivered a workflow specification to Xerox on 8/15/14	
<p><i>5) Functional teams with new leads and Business Analysts did not participate in the requirements definition or early design sessions</i></p> <ul style="list-style-type: none"> <li>- The new teams have not familiarized themselves with the discussions that occurred in the earlier sessions</li> <li>- It is not a good use of DPHHS SME time to repeat information provided to the original Xerox teams</li> </ul>	<ul style="list-style-type: none"> <li>- A risk has been entered in the DPHHS SharePoint list</li> </ul>	<ul style="list-style-type: none"> <li>- New Xerox functional teams should listen to recordings and review meeting minutes from the requirements and early design sessions</li> </ul>
<p><i>6) Xerox has proposed a new Agile-hybrid design and development methodology</i></p> <ul style="list-style-type: none"> <li>- This methodology relies on offline interaction between Xerox functional teams and DPHHS BAs to make design decisions</li> <li>- This methodology does not allow proactive participation by DPHHS SMEs in design decisions</li> <li>- The Sprint Release Plan delivered on 4/12/14 does not appear to have a reasonable number of use cases allocated to Concept Sprint 1</li> </ul>	<ul style="list-style-type: none"> <li>- Discussions have been held between Xerox and DPHHS to better understand the proposed methodology</li> <li>- Xerox delivered a Concept Release Plan on 4/12/14</li> <li>- DPHHS delivered initial comments to Xerox on the Concept Release Plan on 4/13/14</li> <li>- A meeting was held to discuss DPHHS</li> </ul>	<ul style="list-style-type: none"> <li>- DPHHS to monitor the progress of this new methodology and assess it's effectiveness based on DPHHS and Xerox agreed criteria</li> </ul>

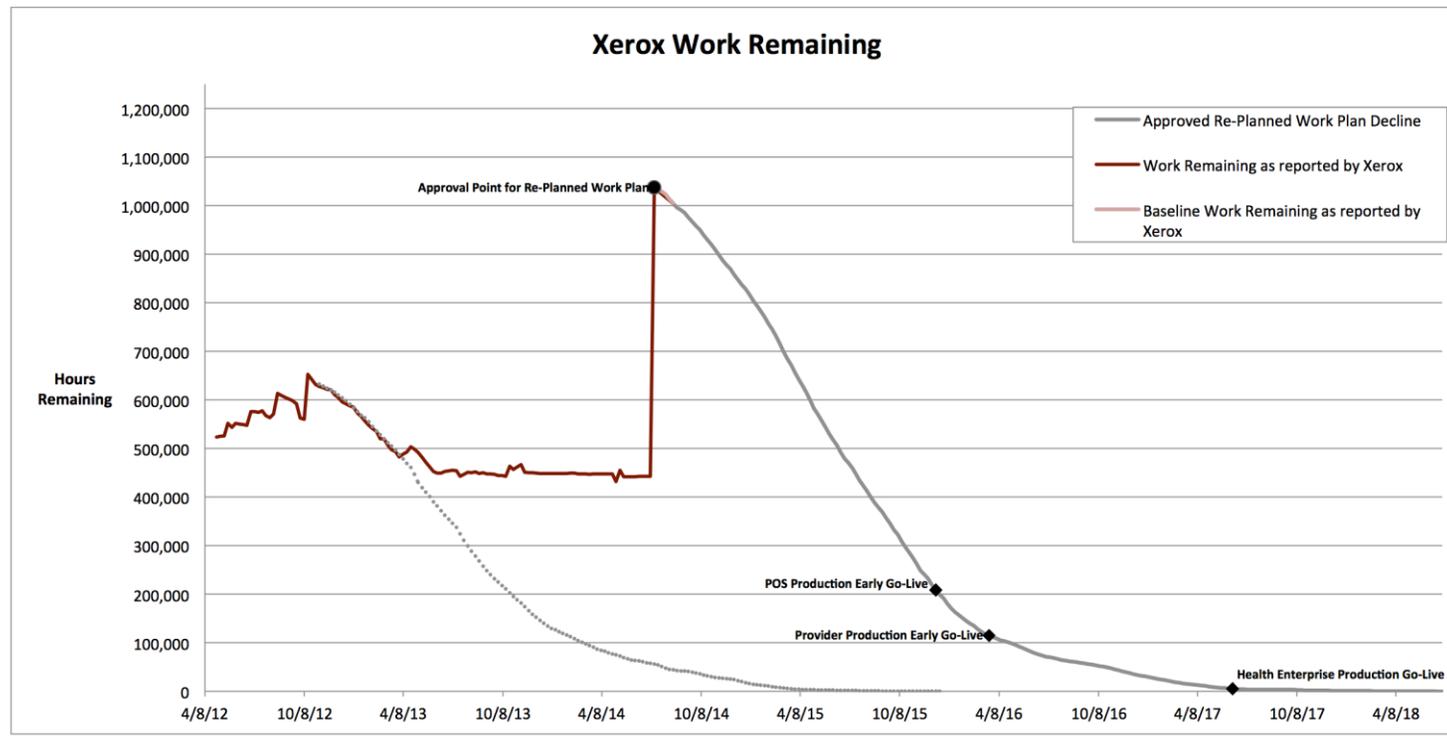
Risk	What's Been Done	Recommendation
<ul style="list-style-type: none"> <li>- Xerox has indicated that concept work not completed in Sprint 1 will be moved to a later sprint</li> <li>- As part of the cure for the material breach, Xerox has 90 days to correctly implement dependencies for the concept and delivery sprints, and correctly align the dependencies in the Concept Release Plan and JIRA</li> <li>- Per the Xerox Daikibo training materials, design documentation to be presented in concept sessions should be complete, accurate, and representative of the functionality in HE env92</li> </ul>	<p>concerns on the Concept Release Plan on 4/14/14</p> <ul style="list-style-type: none"> <li>- CR136 – Complementing the MT SPARKS-ITS Methodology with Agile Daikibo was signed by DPHHS on 7/14/14</li> </ul>	
<p><i>7) Xerox definition of "Ready for Development" is inconsistent</i></p>		
<ul style="list-style-type: none"> <li>- Per the Xerox Daikibo training materials, the goal of a sprint is to deliver Use Cases which are functionally-ready, technically-ready and test- ready</li> <li>- In the Sprint Retrospectives for Sprints 3 and 4, Xerox is including use cases which are only functionally-ready in the "Ready for Development" count</li> </ul>	<ul style="list-style-type: none"> <li>- This has been discussed in the DDI PM meeting, the Xerox Weekly Status meeting and the Governance meeting</li> </ul>	<ul style="list-style-type: none"> <li>- Xerox to define "ready for development" status and correctly classify metrics, based on this definition</li> </ul>

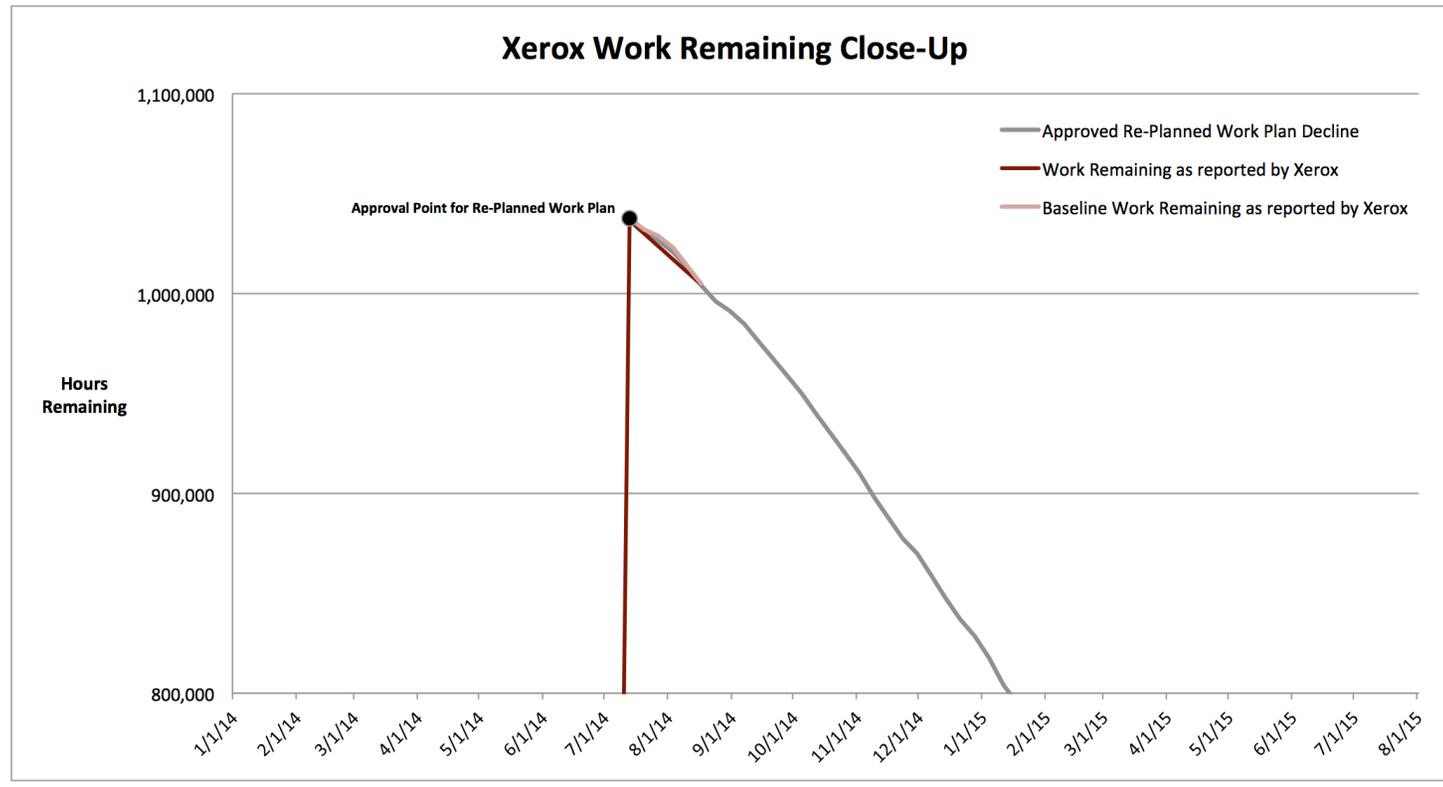
### 1.5 Performance Metrics

The metrics included in this section will vary according to project phase and major activity. These metrics are based on the current approved Xerox project work plan.

### Declining Work Balance

Xerox has not provided data for completion of these graphics. These graphics will be included in the final version of the status report.

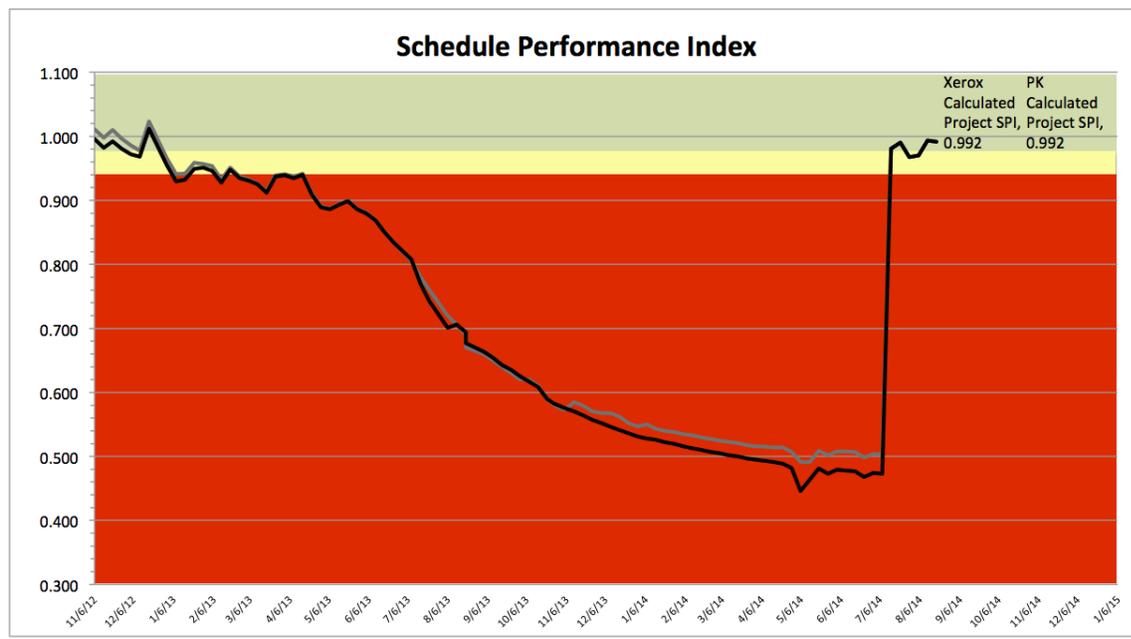




## Schedule Performance Index (SPI)

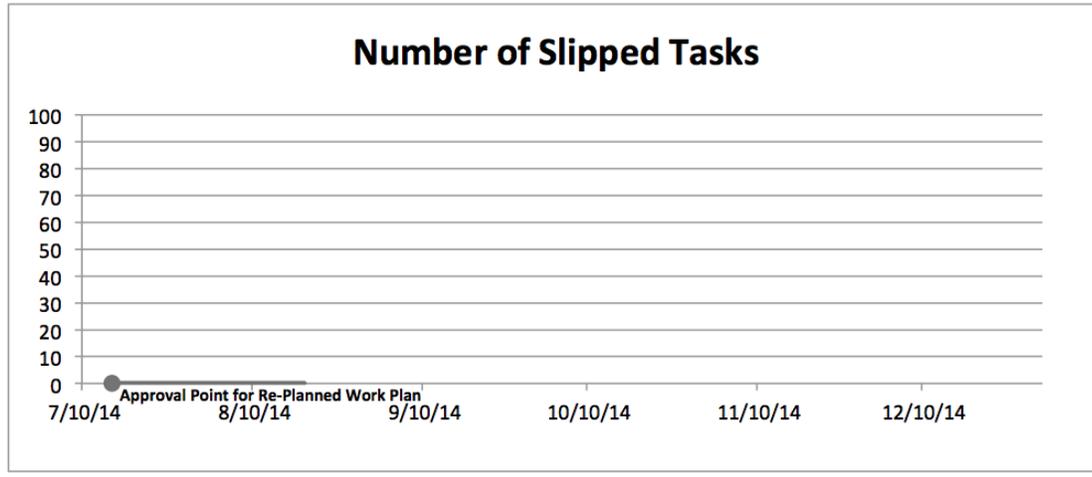
The PK calculated SPI may vary from Xerox reported number based on the following difference in Planned / Earned Value measurement:

- Xerox calculates planned value at the task level while evenly distributing planned hours over the lifetime of the task. As of the July 18, 2014 Monthly Report, Xerox performs a manual calculation for earned value by multiplying the total Baseline Cost by the % work complete. This manual calculation is necessary as the MS Project Server was not able to accurately “roll-up” the values from the thirty-five sub-plans into the “Master Project Sprint Schedule” work plan.
- PK calculates planned value by the hours scheduled to have been completed to date.
- PK continues to use the earned value calculations reported by Xerox in the SPI calculation.



## Slipped Tasks

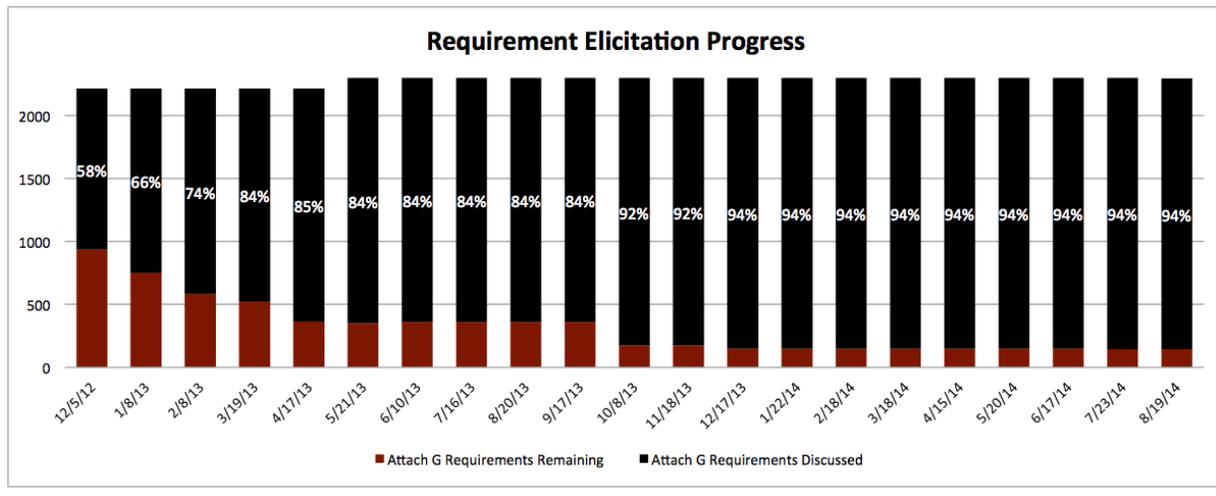
Slipped tasks are tasks whose baseline start and/or finish dates have passed.



## Xerox Functional Area Sprint – Progression and Approval

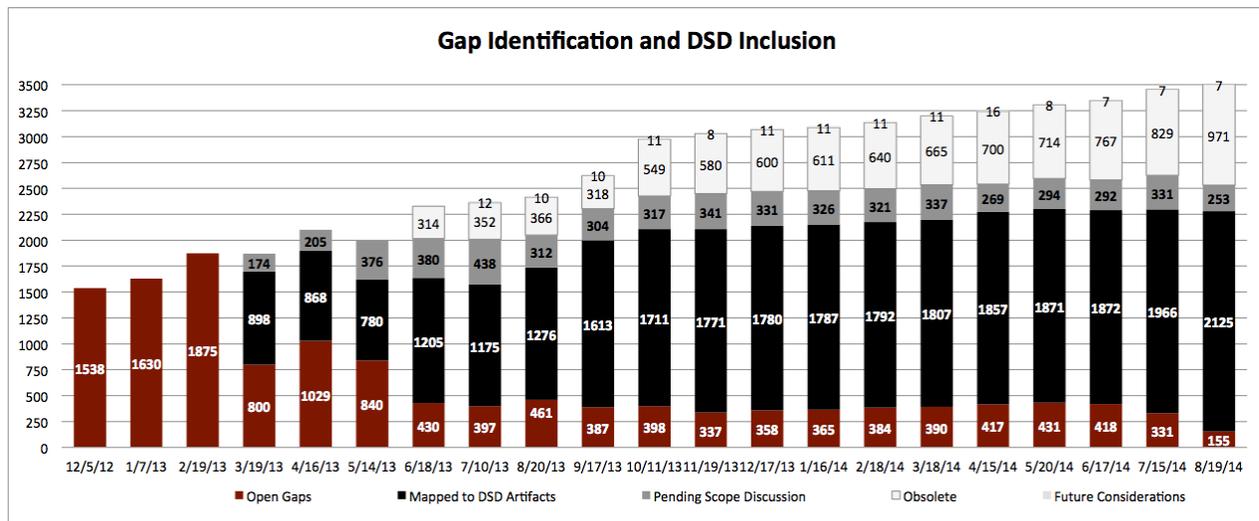
The information to complete this graphic is part of the 90-day plan for Xerox metrics. This graphic will be updated at that time.

## Requirement Elicitation Progress



There are 6% of the Attachment G requirements that have not yet been discussed in all relevant requirements sessions.

## Gap Identification and Design

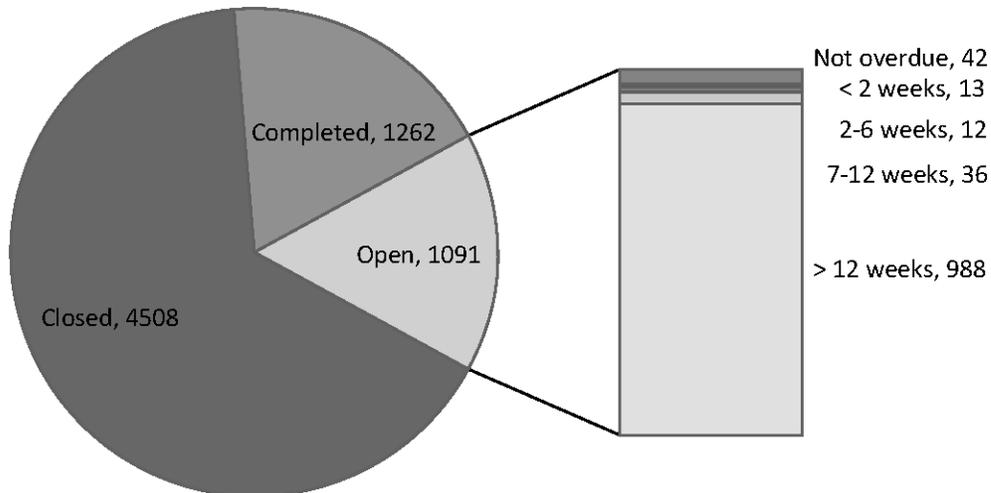


Note: The number at the top of each column (starting in July 2013) is the count of gaps with the status "Future Consideration".

- The Out of Scope Gap count has decreased by 78 since the July monthly report
- There are 174 gaps in a "New" status in DOORS
- 28% of identified gaps have been assigned a status of "Obsolete" in DOORS
- The Obsolete Gap count has increased by 142 since the July monthly report
- There are a large number of gaps (155) that have not been mapped to a DSD artifact. This number has decreased by 176 since the July report
- Total gaps are 3,511

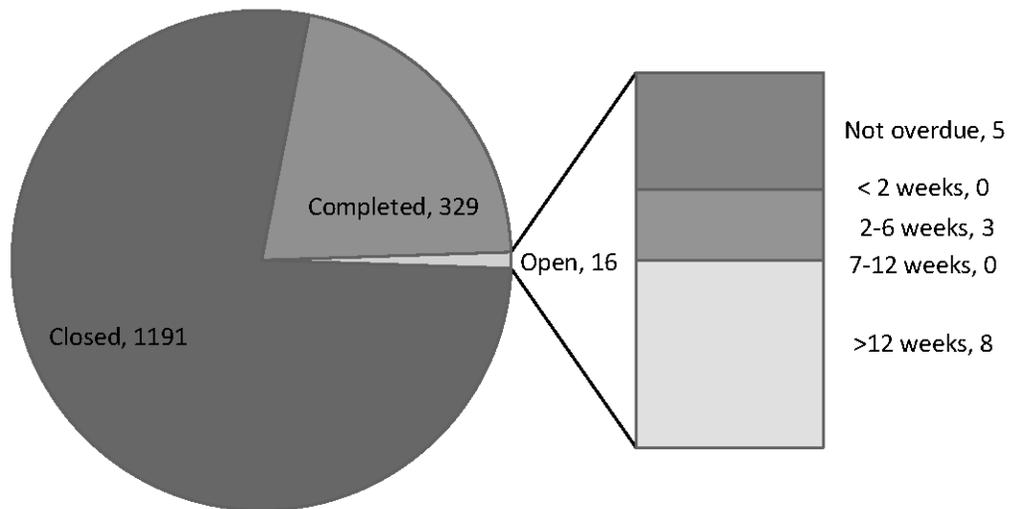
## Xerox SharePoint – Action Items Log

### Xerox Assigned Action Items by Status and Weeks Overdue



- Xerox Open Action Items have decreased by 361 from last month's count
- Xerox Completed Action Items have increased by 232 from last month's count
- Xerox Closed Action Items have increased by 131 from last month's count
- Xerox <2 weeks overdue Action Items have increased by 9 from last month's count
- Xerox 2-6 weeks overdue Action Items have decreased by 45 from last month's count
- Xerox 7-12 weeks overdue Action Items have decreased by 113 from last month's count
- Xerox >12 weeks overdue Action Items have decreased by 241 from last month's count

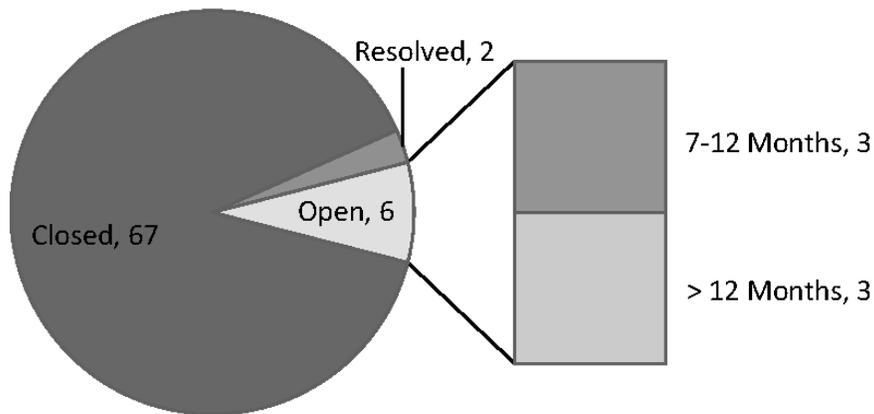
### DPHHS Assigned Action Items by Status and Weeks Overdue



- DPHHS Open Action Items have decreased by 31 from last month's count
- DPHHS Completed Action Items have increased by 9 from last month's count
- DPHHS Closed Action Items have increased by 2 from last month's count
- DPHHS <2 weeks overdue Action Items have decreased by 1 from last month's count
- DPHHS 2-6 weeks overdue Action Items have remained the same from last month's count
- DPHHS 7-12 weeks overdue Action Items have decreased by 9 from last month's count
- DPHHS >12 weeks overdue Action Items have decreased by 17 from last month's count

## Xerox SharePoint – Issues Log

### Issue Log by Age and Status



- Open Issues have decreased by 25 from last month's count, due to closing the missed payment milestone and related issues
- There are three issues that have been open for longer than 12 months

## 2 - IV&V Status Report

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### *Activities Since Last Report*

Planned Activity	Status	Summary of Results
Participated in and scribed the Provider, Waiver, EHR/PHR, Contact Management, Service Auth, Claims Adjudication, Benefit Plan, and Web Portal solution presentation concept review sessions	Complete	Minutes posted to the DPHHS SharePoint
Participated in meeting to discuss baseline work, baseline cost and baseline dates with DPHHS and Xerox during the weeks of 7/28/14, 8/4/14, and 8/11/14	Complete	Completed review of the re-planned Xerox project work plan
Compiled and posted BA and SME survey results for weeks of 7/21/14, 7/28/14, 8/4/14, and 8/11/14	Complete	Posted survey results
Completed letter re-writes during the weeks of 8/4/14, 8/11/14, and 8/18/14	In-Progress	Delivered re-written letters to DPHHS
Conducted letters interviews during the week of 8/18/14	Complete	Conducted and documented these interviews
Facilitated the PK Weekly Status Meeting on 8/13/14	Complete	Facilitated this meeting
Participated in the Meeting with DPHHS to discuss Xerox Status Report meeting with DPHHS and Xerox on 8/13/14	Complete	Participated in this meeting
Participated in the UI Specifications Review – Continued meeting with DPHHS and Xerox on 8/13/14	Complete	Participated in this meeting
Participated in the Review Comments for DSD Report Specification PM Metrics Document meeting with DPHHS and Xerox on 8/13/14	Complete	Participated in this meeting

Participated in the Xerox Weekly Project Status meeting with DPHHS and Xerox on 8/13/14	Complete	Participated in this meeting
Facilitated the Letters Project Weekly Check-in Call meeting with DPHHS on 8/14/14	Complete	Facilitated this meeting
Participated in the MMIS DDI Governance - OOS GAPS meeting with DPHHS and Xerox on 8/14/14	Complete	Participated in this meeting
Participated in and scribed the Financial Mapset Demonstration meeting with DPHHS and Xerox on 8/15/14	Complete	Participated in and scribed this meeting
Participated in the CMS Meeting at MESC Conference meeting with DPHHS on 8/20/14	Complete	Participated in this meeting
Participated in and scribed the Line Allow Code meeting with DPHHS on 8/20/14	Complete	Participated in and scribed this meeting
Participated in the HE User's Group Meeting with DPHHS on 8/20/14	Complete	Participated in this meeting
Attended the MESC Conference with DPHHS the week of 8/18/14	Complete	Participated in this conference
Maintained the PK Remaining Requirements Report	In-progress	This is an on-going task. The Remaining Requirements report will be updated after each collaboration session and based on discussions from informal functional area meetings
Continued maintenance of the Change Control Board Log to track needed changes to the RFP	In-progress	-The Document of Record will be updated as needed -This is an on-going task
Finalizing the PK Project work plan	On-hold	The completion of the PK work plan task is in progress, but currently on-hold, pending the approval of the Xerox project work plan

### Obstructions or Barriers

Obstruction/Barrier	Action Needed
<i>Quality issues with MT MMIS design sessions</i>	Xerox to implement improvements to design sessions and improve velocity on ready for development gaps/use cases, for presentation in SME sessions.
<i>Large number of Xerox action items not addressed</i>	Xerox should create a plan for the rapid closure of action items.
<i>Gap tracking and process management and unresolved out of scope gap concerns</i>	Processes for management of gaps and resolution of the outstanding out of scope gaps should be established and followed.

**Public Knowledge LLC**  
Management Consultants