Attachment W
Pharmacy FWA Audit Services
Mandatory Scored Response Worksheet

Suppliers must provide responses to all questions in this document as a **single** PDF attachment **bookmarked** in sequential order with the title(s) provided in the question.

Each narrative response must start on a new page and must adhere to any assigned page limits. Pages must have one (1) inch margins and be in Arial, size twelve (12) font.

The narrative response, along with any required supporting material, will be evaluated and awarded points in accordance with Attachment A – Lead State eRFP, Section 6 Proposal Evaluation and Award. Documents not requested will not be evaluated.

Failure to provide responses and any required supporting documentation for all questions will result in disqualification of the proposal.

DO NOT INCLUDE ANY COST INFORMATION IN YOUR RESPONSE TO THIS WORKSHEET.

1.	Bookmark Title: MSQ1 - Executive Summary The Executive Summary is limited to five (5) pages. Provide an Executive Summary that illustrates the Supplier's understanding of and capability to provide the requested services as described in Attachment H - Pharmacy Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work and Attachment C - Common Scope Requirements and Security Standards. The Executive Summary must include a brief corporate background of the Supplier, including the date the Supplier was formed, established, or created, total number of employees, Equal Employment Opportunity policy and current percentages in key positions, and location of the Supplier's primary and any satellite offices.

Supplier Response

Thank you for the opportunity to partner with the Georgia Department of Administrative Services (DOAS) and other states in the NASPO ValuePoint Cooperating Purchasing program to provide Pharmacy Fraud, Waste, and Abuse and Audit (PFWAA) Services. Conduent State Healthcare, LLC (Conduent) is committed to partnering with the DOAS and the other NASPO States to deliver comprehensive PFWAA Services to meet agency program integrity objectives.

Our approach is built on a deep understanding of the critical need to address Pharmacy Fraud, Waste, and Abuse (FWA) effectively. Our solution encompasses a detailed scope of work that aligns with both the specified Pharmacy FWA Audit Services SOW and Common Scope Requirements and Security Standards. **Conduent's Multi-faceted approach to FWA integrates innovative strategies to identify fraud, waste, and abuse**. We analyze data with a keen eye for opportunities to promote the safe use of the most effective therapies for your members. We provide advanced analytics and technologies, all supported by experienced clinical pharmacy auditors. **Audit findings and identified trends are incorporated to continuously improve system edits resulting in significant long-term savings.**



With more than 52 years supporting the government health and social service industry, 39 of those specific to the healthcare fraud, waste, and abuse (FWA) detection and prevention market, **Conduent is uniquely qualified to become your trusted partner for FWA Audit Services.**

The core of our Pharmacy FWAA Services involves thorough audits, concurrent reviews, effective data management, and the integration of a Pharmacy Lock-In (PLI) program. All of these services are configured to significantly reduce FWA within the State's Fee-for-Service (FFS) Medicaid pharmacy program. Our operational framework assures adherence to federal and state laws by emphasizing data security, stakeholder management, and comprehensive reporting to maintain transparency and accountability throughout our engagement.

Understanding of Project Scope

The DOAS and other States' Medicaid programs stand as a lifeline for millions, offering essential healthcare services to those in need. However, like any large-scale public service, it faces the daunting challenge of fraud, waste, and abuse – issues that not only demand vital resources but also undermine the trust and efficacy of the healthcare system itself.

Our ability to deliver the requested services is anchored in our expertise in pharmacy audit services and **our innovative use of technology to identify, investigate, and mitigate FWA**. In Table W.1-1, we summarize this approach.

Table W.1-1. Conduent's CMdS FWA Solution Capabilities

Capability	Solution Alignment
General Audit Support and Audit Processes	[redacted]
Concurrent Review Mechanisms	
Comprehensive Reporting and Data Management	
Implementation of the PLI Program	
Adherence to Security Standards and Project Management Best Practices	

Key Features of Conduent's CMdS FWA Solution

Our CMdS FWA solution is designed with the dual purpose of addressing immediate challenges and adapting to the evolving landscape of healthcare management. Our solution delivers:

- **Advanced Data Analytics and Machine Learning.** Our solution leverages cutting-edge data analytics and machine learning algorithms to sift through vast amounts of data, *effectively identifying patterns and anomalies indicative of FWA*. This technology allows for **real-time detection and proactive measures against potential fraud.**
- **Highly Configurable Platform.** Recognizing the unique needs and challenges of each Medicaid program, the solution offers *unparalleled configurability*. With this flexibility, the solution can be efficiently tailored to meet the DOAS- and other State- specific requirements, adjusting alongside your evolving needs.

- **Seamless Integration.** Our PFWAA Service is designed for easy integration with existing healthcare management systems and data sources. This capability allows for a *smooth implementation process* and *enhances the solution's ability to draw comprehensive insights from diverse data sets*.
- **User-Friendly Interface.** With an emphasis on usability, our solution features an intuitive interface that *simplifies navigation and operation for users at all levels*. This design facilitates greater adoption and utilization across healthcare providers and administrative staff.
- **Comprehensive Reporting Tools.** The CMdS FWA solution brings powerful reporting and visualization tools, making it *easier to interpret data and translate insights into actionable strategies*. These tools support informed decision-making and efficient management of FWA investigations.

Commitment to Partnership



Conduent's commitment to DOAS and other States is rooted in our shared objective to foster a healthcare system marked by its fairness, effectiveness, and accountability. Here, we outline our commitment to you, highlighting our goals and the lasting benefits we aim to deliver.

Achieving DOAS' and Other NASPO States' Goals

Conduent's top priority is to meet DOAS' and other States' needs for PFWAA services, focusing on:

- **Boosting Efficiency.** Our solution is designed to make work easier and faster by saving time and effort so *resources can be dedicated to where they're needed most*.
- **Following Rules and Regulations.** We understand the importance of keeping in line with laws and guidelines. Our systems are designed to verify that Medicaid services are following all state and federal rules, avoiding legal issues and keeping everything running smoothly.
- **Being Open and Accountable.** Gaining and keeping the public's trust is crucial. With detailed reports and a clear record of our actions, Conduent is committed to making sure that everything we do for DOAS and other States is clear and open for all to see.

Long-term Advantages

We are looking at the bigger picture, aiming for benefits that will last long into the future:

- **Adaptability.** We work to continually update our strategies and solutions to match the ever-changing healthcare program integrity space, and the growing and shifting needs of the DOAS and other States' Medicaid programs.

Our FWA Audit Solutions

- **Experienced Auditors.** With local and national know-how, our auditors bring state-specific legal insights
- **Evolving Strategies.** Continuous feedback loops refine our detection algorithms to stay ahead of FWA trends
- **Optimized Spending.** Our approach minimizes inaccuracies and returns overpayments to assure judicious spending

- **Innovation.** We pledge to stay innovative, always looking for new and better ways to tackle FWA. Whether it is new technologies or smarter strategies, Conduent is committed to staying at the cutting edge.
- **Cost Savings.** Our goal is to help the DOAS and other States' Medicaid programs save money by reducing FWA. By keeping resources from being wasted, we can help make sure that funds are spent on improving care for those who need it.
- **FWA Expertise and Support.** We aim to build a knowledgeable community that is always on the lookout for FWA. **Our Medicaid-specific FWA expertise and years supporting government health programs provides a laser focused level of analysis and support for DOAS.** We also provide training and ongoing support to the DOAS and other States' Medicaid teams, healthcare providers, and even the people they serve.

Our combination of industry expertise, technological innovation, and a collaborative approach makes sure that we can meet the complex challenges presented in the RFP. We are committed to delivering services that enhance the integrity of the DOAS and other States' Medicaid pharmacy programs, reduce wasteful expenditure, and maintain compliance with all relevant regulations. With Conduent by your side, we're ready to make your PFWAA Services a leading example of efficiency, fairness, and responsibility.

Date Established and Company History

Conduent State Healthcare, LLC (Conduent), the bidding entity under this opportunity, and with over 3,000 employees, is a wholly owned subsidiary of Conduent Incorporated, a public company traded on NASDAQ under ticker "CNDT." Conduent was formed on March 25, 1999, as a Delaware limited liability company (LLC) under the name Consultec, LLC.

As the result of mergers, Conduent has **32 years** of PBM, **33 years** of pharmacy audit, **39 years** of fraud, waste, and abuse (FWA) detection, and more than **50 years** of government-sponsored healthcare experience, with a primary focus on Medicaid. We have provided rebate services supporting Medicaid for **25 years.**

As a publicly traded company, Conduent is regulated by government organizations like the Securities and Exchange Commission (SEC). **This provides more transparency than a privately held company**. Conduent fully complies with the Sarbanes-Oxley Act (SOX) and other regulatory, financial, and SEC audit requirements.

Company Background

As one of the few companies **focused on solutions and services for the public sector industry**, Conduent brings unparalleled experience to the project. We bring a superior understanding and capability to navigate the challenges associated with government benefits and service delivery.

Conduent offers complete independence from drug manufacturers, wholesalers, specialty pharmacies, and other parties that may seek to influence prescribing and utilization patterns. As a publicly traded company with no ties to MCOs or pharmacies, we offer true transparency and accountability. Our pharmacy and clinical services organization is a leading full-service, independent vendor of government healthcare PBM services.

We currently, as of Q1 2024, provide pharmacy claims processing, drug rebate, DUR, and/or clinical services for 13 accounts nationwide, including 10 Medicaid agencies and the United States Department of Labor (DOL), the Ohio Children with Medical Handicaps Program (CMH), and the University of Massachusetts Medical School Prescription Advantage Program. Annually, we process approximately 165 million pharmacy claims representing over 3 billion dollars in claim payments on behalf of 11 million program members. We collect nearly 5 billion dollars in federal and supplemental rebates annually.

Program Integrity and FWA Experience. Conduent's expertise in detecting FWA traces back to our early years working with legacy MMIS systems. During that time, we utilized original mainframe-based Surveillance and Utilization Review Peer Grouping solutions. Over the years, we transformed our approach and technology culminating in the development of a FWA detection system. Our CMdS FWA solution equips state agencies with a comprehensive suite of tools to **identify, quantify, and prevent a wide range of issues** that can lead to inefficient, wasteful, or abusive spending. We also bring extensive experience evaluating state PI activities and recommending and implementing impactful policy design improvements.

As the Medicaid and government healthcare sector is experiencing unprecedented consolidation, several of our competitors are in takeover acquisitions diverting their attention internally instead of on the state customers they serve. While many of these mergers have adversely impacted their customers, Conduent and our Pharmacy FWA solution operations are **100% focused on our Medicaid customers and the members they serve**. Conduent is the low-risk, transparent choice and DOAS can be confident in our abilities to serve the families of Georgia and other NASPO states. We have the resources necessary to perform a seamless implementation and provide quality FWAA services throughout the contract term.

Equal Employment Opportunity (EEO) Policy and Statement

Our commitment to inclusion and diversity within our corporate culture has resulted in being named one of "America's Best 500 Employers for Diversity" by Forbes (2021, 2022 & 2023), a 95/100 score on the Human Rights Campaign Foundation's 2023 Corporate Equality Index (CEI), and honored by Comparably since 2021 for recognizing Conduent with 12 honors including: Best Global Culture, Best Company for Women , Best Company for Diversity, Best CEOs for Diversity, Best CEOs for Women and Best CEOs. Below please find our corporate-wide Statement of Equal Opportunity Employment.

"At Conduent, we are committed to providing an environment of mutual respect where equal employment opportunities are available to all applicants and associates without regard to race, color, religion, sex, pregnancy (including childbirth, lactation, and related medical conditions), national origin, age, physical and mental disability, use of a guide dog or service animal, marital status, sexual orientation, gender identity, gender expression, genetic information (including characteristics and testing), military and veteran status, and any other characteristic protected by applicable law. Therefore, all employment decisions at Conduent are based on business needs, job requirements, and individual qualifications. Conduent believes that diversity and inclusion among our associates is critical to our success as a global company, and we seek to recruit, develop, and retain the most talented people from a diverse candidate pool."

In Table W.1-2 we provide the percentage of employees in key positions (i.e., management, directors, vice presidents, and officers) by EEO category as of March 2024.

Table W.1-2. Key Positions by EEO Category

	Conduent State Healthcare, LLC
Gender	Female
	Male
Race/Ethnicity	American Indian or Alaska Native
	Asian
	Black or African American
	Hispanic or Latino
	Native Hawaiian or other Pacific Islander
	Not disclosed
	Two or more races
	White

Primary and Satellite Offices

Conduent's corporate headquarters are located at 100 Campus Drive, Suite 200E, in Florham Park, New Jersey. In addition to our primary office, we have satellite offices across 31 states, including Georgia, and the District of Columbia. Please note that all project work under this opportunity will be done within the continental US.

The Right Partner for DOAS

With Conduent's deep Medicaid and FWA experience, and our inventive CMdS FWA solution, we bring dynamic and creative capabilities to the DOAS and NASPO Participating Entities in providing Pharmacy Fraud, Waste, and Abuse audit services. We combine business operations excellence with unique and innovative technology to transform and improve services for pharmacies, prescribers, and members. With the implementation of Conduent's CMdS FWA solution, DOAS and other NASPO states have a partner that brings the necessary tools, performance, security focus, and long-term Medicaid FWA expertise to successfully deliver the required FWAA Services needed now and into the future.

2.	Bookmark Title: MSQ2 – Compliance Narrative description is limited to two (2) pages. Describe in detail how you will ensure compliance of systems and services with federal and state law and the State's pharmacy program policies, procedures, and processes as required for this scope of work.

Supplier Response

Conduent's CMdS FWA Solution captures and maintains data necessary to meet all legal State, federal, and administrative requirements, including HIPAA, HITECH and HITRUST - (certified since 2021).

We actively monitor legislative changes, to verify our systems and services are current with governmental regulations. Whenever a government entity updates regulations, we make appropriate adjustments to user interfaces for ongoing compliance.

Conduent's pharmacy audit processes and methodologies are time tested and provide advanced analytics and technologies to curtail rising pharmacy costs.

DDI Discussions. We confirm all system and service requirements that are in scope for the project and establish a records management policy with DOAS and other States to validate prior to implementation. This system's assessment and confirmation of services ensures a consistent program in compliance with DOAS- and other State-approved pharmacy policies, procedures, and processes.

Documentation. We retain documentation and records necessary to support pharmacy audit dispute resolution and appeals. We make the information available to DOAS and other States' authorized representatives and can provide it upon request. Further, Conduent provides pharmacy audit interpretation on the supplemental documentation. We track, store, maintain, and report the status of our support actions from receipt to final determination. We meticulously maintain records, supporting data, status information, and communications.

Table W.2-1 below shows our approach, ensuring system and service compliance.

Table W.2-1. Approach to System and Service Compliance



We use automated compliance testing tools to confirm that our screens meet these accessibility standards. As state and federal governments introduce new regulations, we combine automated and manual testing tools for ongoing compliance and meeting users' needs.

By fully embracing industry standards, the solution promotes interoperability with other systems and programs for seamless integration and efficient communication among different platforms.

Additionally, our CMdS FWA Solution web portal goes beyond compliance with regulations such as the ADA and Section 508 of the Federal Rehabilitation Act of 1973 (29 U.S.C. 794d). These standards guarantee that electronic information is accessible to individuals with disabilities. To fulfill these requirements, we implement various measures, including:

[redacted]

3.	Bookmark Title: MSQ3 – Desk Audits Bookmark Title for Supporting Material: MSQ3.1 - Desk Audit Flowchart Narrative description is limited to two (2) pages, not including the required supporting material. Describe in detail your process for selecting claims and conducting desk audits. Include in your response the procedure you will follow when a desk audit has been completed including, but not limited to, the requirements stated Attachment H - Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 2.2 Desk Audits.

Supplier Response

Conduent's Desk and Field Pharmacy Audit Services help DOAS and other States' ensure that every dollar is spent judiciously, and payment inaccuracies are minimized. We do this through onsite audits, desk audits, concurrent claim reviews and ancillary services including invoice, pre- and post- network enrollment, onsite credentialing, enhanced Fraud, Waste and Abuse (FWA) audits, and, as applicable, drug manufacturer rebate audits. Figure W.3-1 shows our 5-Step proven process that delivers results.



Figure W.3-1. AuditTrack Tool – Pharmacy Audit Process

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWAA services and provide a compliant narrative response: Attachment H – Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 2.2 Desk Audits.

Selecting Claims for Audits. Conduent scores and selects pharmacies in the network for audit using AuditTrack's claims analysis. Pharmacies with the highest score from AuditTrack are deemed most likely to have audit findings. Table W.3-1 details the steps.

Table W.3-1 Pharmacy Audit Process

[redacted]

Desk Audit Review Process. Conduent's desk audit process uses a proven, cost-effective tool. The audits also produce findings that may improve system edits resulting in significant long-term savings. Additionally, desk audits with material findings (due to abuse or non-compliance) serve as a valuable screening tool to indicate the need for future onsite audits. **If a prescription is cited, the associated refills that are within the scope of the audit are cited as well for review.**

[redacted]

If the documentation does not meet the required standards, discrepancies are shared with the pharmacy for remediation. The pharmacy is then granted a 30-day period to respond with any mitigating documentation that could address the identified discrepancies. Once the pharmacy provides the requested information, we review the audit results and update our findings based on

the new materials submitted. This process will continue until the audit is complete. Following these updates, we will send a Final Results letter to the pharmacy, to complete the audit and provide the pharmacy with our updated results.

All correspondence related to the audit is meticulously stored and made accessible to the State upon request or through our secure client portal, ensuring transparency and accessibility of audit-related communications.

4.	Bookmark Title: MSQ4 – Field Audits Bookmark Title for Supporting Material: MSQ4.1 – Field Audit Flowchart Narrative description is limited to two (2) pages, not including the required supporting material. Describe in detail your process for selecting claims and conducting field audits. Include in your response the procedure you will follow when a field audit has been completed, including, but not limited to, requirements identified in Attachment H – Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 2.3 Field Audits.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWAA services and provide a compliant narrative response: Attachment H - Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 2.3 Field Audits.

In this section we detail our process using AuditTrack to select claims for field and desk audits.

Selecting Claims for Field Audits. Conduent uses our AuditTrack claims analysis to select and score pharmacies in the network for field audits.

Field Audit Review Process. Our pharmacy audit processes and methodologies are time tested and have provided our customers with advanced analytics and technologies, supported by experienced clinical pharmacy auditors. Our field audits provide a complete end-to-end audit process, including pharmacy notification, audit, post-audit documentation, pharmacy interaction, and results of completed audits.

Conduent administers the pharmacy audit process, which includes notification, audit, post-audit documentation, pharmacy interaction, and results of completed audits.

Pharmacies are selected for field audits using our auditing system that reviews paid claims data and applies a scoring process to target pharmacies for audit.

[redacted]

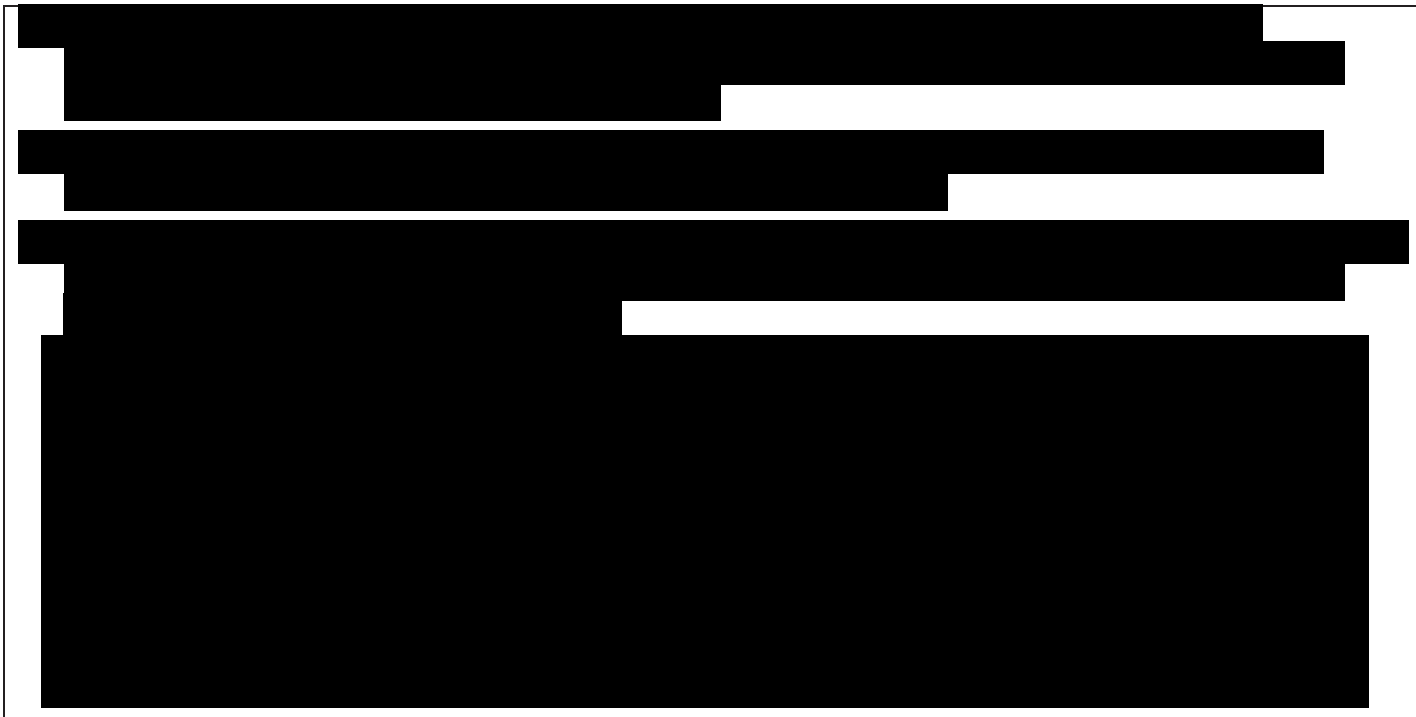


Figure W.4-1. Conduent Pharmacy Field Audit Workflow

5.	Bookmark Title: MSQ5 – Grievances Bookmark Title for Supporting Material: MSQ5.1 – Grievances Flowchart Narrative description is limited to two (2) pages, not including the required supporting material. Describe in detail your procedure for addressing grievances and processing State approved settlements utilizing, but not limited to, the requirements as stated in Attachment H - Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 2.4a Grievances.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWAA services and provide a compliant narrative response: Attachment H – Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 2.4a Grievances.

Our CMdS FWA solution incorporates a robust Grievance Management module typically within our integrated Customer Relationship Management (CRM) system. We allow pharmacies to submit grievances electronically as case records. These case records are securely stored within the FWA, facilitating efficient tracking, management, and resolution.

Benefits of our CMdS FWA solution Grievance Management

- Storage of key details such as the date a grievance was filed, type of appeal, filer, date of appeals notification, and decision or outcome
- Links to all relevant documentation using a unique identifier for easy access and organization
- Upload and download for case tracking information and documents, facilitating efficient communication and information sharing
- Application of data retention date requirements for paper documents and record disposal

Grievance and Appeals Policy and Procedures

Following contract award, Conduent will submit our written policy outlining our comprehensive G&A handling procedures. This policy will be presented for DOAS and other States approval. Our policy will provide:

- Clear definitions of grievances and appeals, differentiating between the two.
- A step-by-step process for submitting grievances and appeals electronically through the CMdS FWA solution.
- Defined timelines for initial response, investigation, and resolution of grievances (typically ranging from 15 to 30 days as mandated by Federal and State regulations).
- Procedures for documenting and processing State-approved settlement

Grievance and Appeals Templates

Conduent will develop and submit standardized templates for all communication related to grievances and appeals for DOAS and other States. These templates will include:

- Standardized grievance and appeal submission forms within the CMdS FWA solution
- Pre-defined letters for grievance and appeal acknowledgement, updates, and resolution notifications
- Standardized settlement agreements

All templates will be presented to the State for approval before implementation.

Independent Grievance Review Committee

Following contract award, Conduent will establish an independent grievance review committee per the requirements of Section 2.4.4. We will collaborate with DOAS and other States to select the appropriate stakeholders to participate in the committee that meets the following criteria:

- Composed of neutral individuals with no affiliation to DOAS and other States audit teams or Conduent.
- Possesses relevant expertise in pharmacy operations and audit procedures.
- Operates with established protocols for fair and impartial grievance review.

Administrative Review Process

Conduent's multi-tiered administrative review process for discrepancies ensures members are getting the benefits they deserve. Our process also allows pharmacies the right to challenge such discrepancies. Our Administrative review process is as follows:

- **Level 1: Internal Review.** Pharmacies can request an internal review by a designated Conduent representative not involved in the initial audit.
- **Level 2: External Review.** Following the internal review, pharmacies can request an independent review by the pre-established grievance review committee (Section 2.4.4).
- **Level 3: Administrative Law Judge (ALJ) Review.** As a final step, pharmacies will have the right to pursue an ALJ review according to State guidelines.

Appeals Support

Conduent is committed to confirming providers have the necessary support and resources for an efficient pricing appeal process through the PBA Services. Our approach includes comprehensive and streamlined communication with the provider(s), and **detailed** reporting to facilitate understanding and compliance with our pricing appeals process.

- **Initial Inquiries.** With the CMdS FWA solution, we start looking into any questions or appeals within 24 hours.
- **First Response.** Within 72 hours, CMdS FWA Solution alerts providers that we are addressing the issue. These alerts tell providers what happens next, if we need more information, and estimated timing for response/resolution.

6.	Bookmark Title: MSQ6 - Review Process Narrative description is limited to four (4) pages. Describe in detail your process to review pharmacy and medical utilization of Members to identify areas of concern for both Members and Providers utilizing, but not limited to, the requirements stated in Attachment H - Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 5 Pharmacy Lock-In (PLI) Program.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWAA services and provide a compliant narrative response: Attachment H - Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 5 Pharmacy Lock-In (PLI) Program.

Should the State choose to implement **Member Fraud and Abuse detection services**, Conduent's FWA Audit team will review pharmacy and medical utilization of Members to identify areas of concern for both Members and Providers, as identified by DOAS and other States, and provide recommendations for prohibiting misuse.

For the **Pharmacy Lock-In (PLI) services**, we evaluate Medicaid members identified as potential lock-in candidates in accordance with State-approved Lock-In criteria. We work with DOAS and other States during the Solution Planning and Design Phase to determine current criteria used to identify lock-ins. We develop processes and procedures to identify at-risk candidates and our pharmacists evaluate this list. We then apply the appropriate lock-in to individuals within the CMdS FWA solution for use during adjudication. Our lock-in services are performed by pharmacists who monitor and identify the overuse and/or unnecessary or inappropriate use of prescription drugs. They make lock-in recommendations (pharmacy or provider) to our customers.

Pharmacy Lock-In (PLI) services

- Our lock-in support services are performed by clinicians who monitor and identify the overuse, and/or unnecessary or inappropriate use of prescription drugs to make lock-in recommendations (pharmacy or provider) to our customers.
- Conduent participates with agency staff at care coordination meetings and provides supporting documentation related to lock-in recommendations. Lock-in candidates are issued a letter informing them of the program's findings and that they will be restricted to using one pharmacy and/or provider.

Conduent participates with DOAS and other States' staff at care coordination meetings and provides supporting documentation related to lock-in recommendations. Lock-in candidates are issued a letter informing them of the program's findings and that they will be restricted to using one pharmacy and one provider. Further capabilities include the ability to define and configure benefit plan restrictions that apply to a given Plan including but not limited to benefit restrictions on a lock-in or other monitoring program, living arrangements (e.g., ambulatory vs. long-term care settings), managed care status, Medicare status, Third-Party Liability (TPL), and eligibility. Our staff support the Lock-In program services and manually apply the lock-in of at least one pharmacy and one prescriber to appropriate beneficiaries.

Lock-In Functionality. The system has the capability to lock members into multiple pharmacies and/or medical providers. The lock-in functionality requires members to receive benefits from

specific providers or combinations of providers and locations. For example, DOAS and other States can lock-in a member with a provider for case management purposes or to prevent the member from abusive and wasteful Medicaid program behaviors like obtaining drugs from multiple prescribers or pharmacies. If a member has lock-in restrictions, the system compares the member's prescriber and/or pharmacy IDs to the lock-in restrictions. An exception posts when there is a discrepancy between the claim and lock-in restrictions. The CMdS FWA solution has the capability to allow a user to load an override for a lock-in for a specified amount time if needed. Figure W.6-1 shows the member lock-in screen. Note, sensitive information is redacted from our screenshots for privacy and security purposes.



Figure W.6-1. Lock-in Functionality
The lock-in screen allows users to view and update lock-in data for each member.

Pharmacy Lock-In. The innovative lock-in module in CMdS FWA solution identifies potential members for the lock-in program who would benefit from increased coordination and implemented restrictions.

After we identify exceptions, as requested, we develop intervention packages. Alternately, as needed, we can provide prescriber letters. For some clients, intervention programs can include member medication histories when appropriate or educational materials with clinical references.

During implementation, as a critical step in the regimented configuration and customization process, we work with you to discuss in detail the options to best meet your specific intervention requirements.

[redacted] For example, for other Medicaid programs, we have provided the reports listed in Table W.6-6.

Table W.6-6. Examples of DUR Reports

[redacted]

All criteria employed in interventions and the resulting outcomes satisfy state and federal reporting requirements.

By employing customizable criteria to analyze large volumes of medical and prescription claims data, we provide actionable information for the member profile review process and population-based interventions. The solution identifies providers with prescribing practices outside the standards of evidenced-based care. Interventions guide meaningful change in prescribing behavior to positively affect quality and reduce costs. The targeted population-based interventions maximize the number of people reached, provide cost savings, and address significant safety concerns in this population.

As applicable, our team conducts outcomes assessment and financial and clinical data analyses. These reports document the date ranges used for claims (baseline and post), the methods used to identify clinical concerns, and the financial return for DOAS and other States.

7.	Bookmark Title: MSQ7 – Cost Avoidance Strategy Narrative description is limited to four (4) pages. Describe in detail the effectiveness of your cost avoidance strategy for selecting claims in your concurrent review program. Refer to Attachment H - Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 3 Concurrent Reviews.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWA services and provide a compliant narrative response: Attachment H – Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 3 Concurrent Reviews.

During the concurrent review process, our CMdS FWA solution carefully examines the claims level information received from the PBA vendor and, as applicable, other insurance companies.

As a FWA safety net, via a robust Coordination of Benefits (COB) review, we work to confirm appropriate billing of all benefits available from third-party payers before billing Medicaid to avoid paying claims that someone else should cover. This review can also include attachments like an EOB when a member submits a paper claim.

When you partner with us, you can expect the following:

- An additional level of verification that third-party carriers made payments prior to billing Medicaid using configurable policy based on available data
- Automatic identification/questionnaire generation based on configurable indicators
- The expertise to identify unresolved discrepant Claims that were not remedied
- Estimated cost avoidance to the State

Our CMdS FWA solution and concurrent review identifies claims exceptions based on the available policy information, Medicare coverage, and other-payer data as provided. The system determines if it should apply any exceptions to the claim. The system only applies exceptions when all the conditions defined in the ruleset are true.

The cost avoidance and COB rules dictate how the system reviews claims. These rules govern the actions taken to avoid unnecessary costs and determine the appropriate steps users should take in cases where they may need to pursue payments.

Additionally, we can configure our CMdS FWA Matrix to exclude claims when the other payer has already reviewed the claim and indicated that the policy's benefits does not cover the requested service. The line item claim detail adjustment reason and remark codes on the claim typically communicates this information.

Our CMdS FWA Matrix is configurable providing the flexibility to make updates as necessary and the transparency into the rules governing the process.

Figure W.7-1 provides an example of a Matrix rule.



Figure W.7-1. CMdS FWA Matrix Rule Configuration

Our CMdS FWA Matrix assigns rules to govern the way the system applies COB edits to claims. In this example, if the system detects noncompliance with the rule condition, the system posts exception 6230 to the claim.

As applicable, we configure bypass criteria according to DOAS and other States' policy guidelines, which may include factors like member exhausted benefits, specific benefit plans, or certain types of services.

8.	Bookmark Title: MSQ8 – Proposed Reports Bookmark Title for Supporting Material: MSQ8.1 – FWA Reporting Samples Narrative description is limited to five (5) pages including the outline(s) of the sample reports, not including the required supporting material. Provide a listing of all proposed reports including the frequency of each report, purpose and synopsis that will be provided to the State. Include with your response an outline of a quarterly utilization and performance report that will be developed and customized to meet the needs of the State and are readily accessible to authorized users along with any limitations with accessing each report. Refer to Attachment H - Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 4.1 Reporting.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWAA services and provide a compliant narrative response: Attachment H – Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 4.1 Reporting.

Conduent's proprietary technology and analytics form the backbone of our comprehensive audit solutions. Through our extensive process, we are able to uncover audit targets and improve your overall recoveries.

Our CMdS FWA solution utilizes advanced analytic methodologies to identify aberrant and potentially abusive behavior by providers and/or patients. DOAS and other States can access our comprehensive, web-based reporting capabilities through a secure web portal providing real-time, line-item detailed reports on audited pharmacies. In addition to our standard reporting package, we also provide an interactive dashboard for audit results and reports.

Outline and Summary of Proposed Reports

We provide the DOAS State Pharmacy Network Manager the reports shown in Table W.8-1 monthly in Excel format.

Table W.8-1. Monthly Proposed Reports

Title	Description
Monthly Audit Claims Report	[redacted]

Year-to-Date (YTD) Audit Claims Report	[redacted]
Discrepancy Claims Report	
Year-to-Date (YTD) Discrepancy Claims Report	
Monthly Recovery File	

Figure W.8-1 shows a sample report that DOAS and other States may view and print from the online portal. They can choose to view a variety of summary and detail level reports.

[redacted]

Figure W.8-1. Audit Results Report
This report provides quick and easy retrieval of information for authorized users.

We provide the DOAS State Pharmacy Network Manager the reports shown in Table W.8-2 quarterly in Excel format.

Table W.8-2. Quarterly Utilization and Performance Reports

Report Type	Report Title	Report Description
Drug Reports	[redacted]	
Member Reports		
Pharmacy Reports		

Customized Reports

Reports are of no benefit to you if they don't meet your specific needs. We know this and make all our reports customizable for DOAS and other States.

Readily Accessible Reports

The CMdS FWA solution's Online Portal is a live online tool to access, view, and interact with the pharmacy audit process. Users with access can:

- View for each audit
  - Audited Claims Data
  - Auditor Reports and Comments
  - Pharmacy Documentation
  - Audit Result Letters
- View Audit History
- Request Audits – DOAS and other States can request audits of specific pharmacies

Redacted Copy-Available for Public Review

Easy Access to Reports

Key features of the Plan Reporting module include:

- Rapid access to key reports and queries to identify and deter fraudulent behaviors from pharmacies, providers, and members
- Provider profiling analysis that targets outlier prescribers based on criteria set by DOAS and other States
- Rules-based set of sophisticated clinical therapeutic criteria (clinical rules) that are effortlessly adapted to reflect input from the State's DUR coordinator and DUR committee
- Reporting modules that are intuitive, flexible, and interactive and use up to 12 continuous months of pharmacy and medical claims data
- Ability to organize large data sets into meaningful member and population-based interventions
- Ability to integrate medical and drug claims into one database, plan amount paid

9.	Bookmark Title: MSQ9 – Security Controls Narrative description is limited to five (5) pages. Describe in detail how your administrative, technical, and physical security controls demonstrate compliance with HIPAA Security Laws and Regulations to meet the requirements stated in Attachment C - Common Scope Requirements and Security Standards Section 6: Medicaid Enterprise System Security Standards.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWAA services and provide a compliant narrative response: Attachment C – Common Scope Requirements and Security Standards Section 6: Medicaid Enterprise System Security Standards.

Conduent maintains a steadfast commitment to HIPAA compliance by incorporating the Defense-in-Depth security method into every facet of our CMdS FWA solution. This commitment is not just a legal obligation for us but a core component of our organizational ethos, verifying that sensitive health information entrusted to us by DOAS and other States is protected against any unauthorized access or breaches.

Experience Matters

- Throughout the contract, we incorporate our tested approach applying multiple layers of administrative, physical, and technical controls to protect your data, staff, and processing facilities.
- This framework is a proven and effective method of data protection for a wide range of Conduent customers, including 31 states, the District of Columbia, and Puerto Rico.

Our approach to safeguarding sensitive information and assets within our systems employs the Defense-in-Depth security method. Illustrated in Figure W.9-1, the Defense-in-Depth security method, which is both a best practice and an industry standard, involves deploying multiple layers of security measures to offer enhanced protection. The premise is simple yet effective: if one layer is compromised, others remain in place to continue safeguarding against unauthorized intrusion.



Figure W.9-1. The Defense-in-Depth Security Approach
Multiple layers of security safeguard the DOAS and other States' staff, systems, and facilities.

Administrative Controls

At the foundation of our security infrastructure are our administrative controls, showcasing our dedication to thorough compliance and operational excellence. We've developed a comprehensive set of policies and procedures configured to specific aspects of data security and privacy. This fosters a culture of accountability and vigilance throughout Conduent.

- **Policies and Procedures.** Our policies cover various aspects of data handling, access, and communication, regularly updated to align with evolving regulatory landscapes and technological advancements.
- **Employee Training Program.** Emphasizing continuous learning, our programs confirm every team member understands their role in maintaining HIPAA compliance, covering everything from basic data privacy principles to advanced breach response strategies.
- **Incident Response and Breach Notification Processes.** Despite our best efforts, the possibility of a security incident cannot be entirely eliminated. We have established tough mechanisms to address any potential breaches swiftly and effectively, with an accurate notification process confirming compliance with legal and regulatory mandates.

Technical Controls

Our technical measures are meticulously designed to protect electronic Protected Health Information (ePHI), preventing unauthorized access and making certain that our systems remain secure against both internal and external threats.

- **Access Control Mechanisms.** At the core of our technical defenses is a sophisticated access control system. This system makes certain that only authorized personnel can access sensitive data, employing a combination of unique user identifications, strong authentication processes, and role-based access controls. Each access request is scrutinized, verifying legitimacy and necessity, thus minimizing the risk of unauthorized data exposure.
- **Data Encryption Methods.** We employ advanced encryption protocols for all ePHI, whether it is in transit across networks or at rest on our storage media. This encryption acts as a formidable barrier, rendering the data unintelligible to unauthorized users and verifying its integrity and confidentiality.
- **Audit Controls and Mechanisms.** Vigilant monitoring is key to maintaining the security of our systems. We employ comprehensive audit trails that record every interaction with our systems and ePHI, providing a transparent and traceable log that can be analyzed for any signs of unauthorized or anomalous activities. These mechanisms are crucial for early detection and response to potential security incidents.

Physical Controls

Our commitment to HIPAA compliance extends beyond digital realms, manifesting in robust physical security measures that safeguard our facilities and hardware against unauthorized access or breaches.

- **Facility Access Controls.** We employ stringent access controls at all Conduent facilities, verifying that only authorized personnel can enter areas where sensitive information is processed or stored. This includes the use of security badges, biometric scanners, and surveillance systems, creating a multi-layered defense against physical intrusions.
- **Workstation and Device Security.** Every workstation and device within Conduent are configured to adhere to strict security standards, minimizing the risk of data exposure. Policies are in place to make sure that devices are locked or logged off when unattended, and data is encrypted to prevent unauthorized access.
- **Procedures for the Proper Disposal of ePHI and Hardware.** We have established meticulous procedures for the disposal of ePHI and related hardware. All media are wiped, destroyed, or degaussed according to industry best practices, verifying that no sensitive information can be recovered once a device is decommissioned.

Compliance with Medicaid Enterprise System (MES) Security Standards

Our adherence to MES Security Standards is evident in our holistic approach to security, spanning administrative, technical, and physical controls. Our compliance is demonstrated through regular internal and external audits, assessing our adherence to HIPAA and MES standards, and

identifying areas for improvement. This comprehensive framework not only meets but often exceeds the strict requirements set forth in Section 6.

- **Evidence of Compliance and Audits.** Our commitment to transparency and accountability is demonstrated through regular internal and external audits. These audits assess our adherence to HIPAA and MES standards, identifying areas of strength and opportunities for improvement.
- **Continuous Monitoring and Improvement.** The landscape of information security is ever evolving, and so is our approach to compliance. We engage in continuous monitoring of our security practices, verifying they adapt to new threats and regulatory changes. This commitment to improvement is key to our long-standing compliance and the trust our clients place in us.

Conduent's dedication to HIPAA compliance and data security is foundational to our operations. Through PFWAA Services, we offer DOAS and other States a secure solution for managing their pharmacy programs. Our proactive, comprehensive security measures make sure that we remain a trusted partner for DOAS and other States, continuously enhancing our practices to protect sensitive information effectively.

10.	Bookmark Title: MSQ10 – Encryption Narrative description is limited to five (5) pages. Describe in detail your method(s) for verifying encryption of all stored and transmitted State data containing Protected Health Information (PHI) including email and data that is stored in databases, file systems, desktop and mobile devices, removable media, disaster recovery platforms or other structured storage methods using NIST approved encryption protocols to meet the requirements stated in Attachment C - Common Scope Requirements and Security Standards Section 6: Medicaid Enterprise System Security Standards.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWAA services and provide a compliant narrative response: Attachment C – Common Scope Requirements and Security Standards Section 6: Medicaid Enterprise System Security Standards.

Conduent prioritizes the utmost importance of data security – especially within the healthcare domain. Our commitment to employing advanced encryption methods to safeguard Protected Health Information (PHI) against unauthorized access is central to our CMdS FWA solution. This commitment is vital for DOAS and other States.

Due to the sensitive nature of the health information managed and the potential implications of data breaches, the significance of this commitment cannot be overstated. By implementing strong encryption standards and practices, Conduent demonstrates its dedication to data security and positions itself as a trusted partner in healthcare data management for DOAS and other States.

Encryption Standards

[redacted] By integrating these protocols, PFWAA Services makes certain that every facet of PHI data handling, from storage to transmission, is protected using methodologies that are recognized globally for their strength and effectiveness in encryption.

[redacted]

[redacted]

Conduent's encryption practices are aligned with NIST's recommendations, underscoring a proactive approach to cybersecurity. Regular updates and assessments confirm that the employed

encryption standards are not only current but also effective against known vulnerabilities. By institutionalizing these standards, Conduent demonstrates a layered security approach, embedding encryption deeply within its data handling processes, which is pivotal for maintaining the confidentiality, integrity, and availability of PHI data.

In this framework, Conduent's selection of NIST-approved protocols underscores a commitment to best practices in data security, aligning with industry and federal guidelines to confirm the highest protection level for sensitive health information. Through these measures, Conduent affirms its role as a trusted steward of PHI, embodying a culture of security and compliance.

Data Storage Encryption

For data at rest, Conduent employs various encryption methods to secure databases, file systems, and devices. For instance, AES-256 is used for its high level of security and computational effectiveness in verifying that sensitive data remains inaccessible even in the event of potential security breaches. Specific protocols are configured for different storage types, from hard drives to cloud environments, so that comprehensive protection is maintained across all platforms.

Within Conduent's data storage encryption framework, AES encryption secures PHI in databases by encrypting data at rest, which includes all active data, backups, and even snapshots, to thwart unauthorized access attempts. For devices like workstations and mobile units, Conduent integrates full disk encryption, verifying that data is inaccessible without proper authentication, regardless of the device's physical security.

Removable media, crucial for data portability, are encrypted using stringent protocols to maintain data confidentiality during transit or offsite storage. In disaster recovery scenarios, encryption is paramount to safeguarding data integrity, verifying that even during unforeseen events, PHI remains protected, aligning with Conduent's commitment to data security and regulatory compliance across all its data storage solutions.

Data Transmission Encryption



Figure W.10-1. Data in Transit Encryption
Routing of information between cryptographic endpoints supports the protection of ePHI and PII for secure transmission.

Conduent uses an open-source integration framework that produces a routing and mediation engine. This plays a critical role in making certain that your data is transmitted securely and efficiently. Its flexibility, scalability, and ability to enforce security policies make it a valuable tool for any organization that needs to send data between different systems and endpoints.

We use these tools to make digital signatures for exchanging data. These tools have two endpoints that can be used together to create a signature for a step in the data exchange process. Later in the process, the signature is checked to make sure everything is safe.

Email Encryption Process

Email encryption is managed through services that enforce encryption for messages containing PHI, verifying that any data sent across networks is safeguarded against interception and unauthorized access. The email encryption process utilizes various technologies at each step to verify data security. Figure W.10-2 depicts the journey of an email from the unique key generation through the secure access to the message's contents.

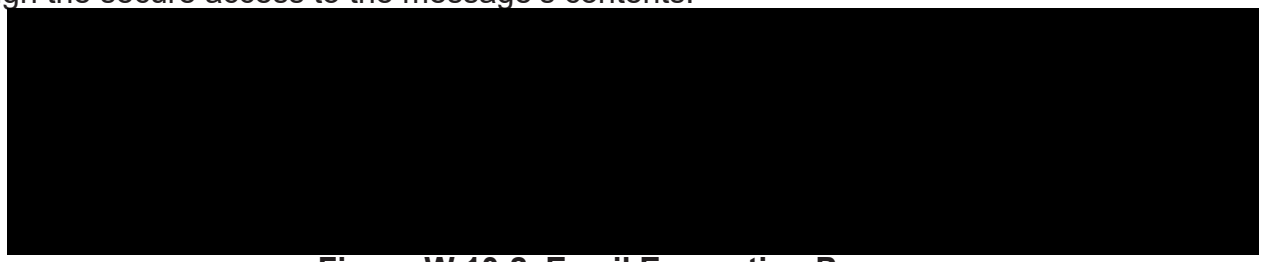


Figure W.10-2. Email Encryption Process
The email encryption process from key generation to secure transmission and decryption by the recipient.

PKI technology generates a unique encryption key during the key generation step. Encryption algorithms like AES or RSA encode the email's content, which is securely transmitted over the network using the TLS protocol. At the recipient's end, the private key and email client work together to decrypt the message, enabling the recipient to access the readable content.

Policy and Compliance

Conduent is deeply committed to upholding the highest standards of data security and regulatory compliance, particularly concerning the protection of PHI. Our policies and practices for data encryption align with NIST recommendations and the Medicaid Enterprise System (MES) Security Standards, as detailed in Attachment C.

Conduent's policy requires that we implement proper and effective use of encryption and cryptographic controls to protect the confidentiality, authenticity, and integrity of information in transit and at rest adhering to the minimum requirements of FIPS 140-3. Regular self-assessments and third-party audits verify our compliance so that our encryption methodologies remain at the forefront of industry best practices.

Our commitment to transparency and accountability in our compliance efforts is paramount. We meticulously document the outcomes of our compliance assessments and audits, leveraging this data to inform continuous improvement in our security protocols. This proactive approach not only demonstrates our dedication to safeguarding sensitive data but also underscores our broader

organizational commitment to maintaining the trust and confidence of the clients and communities we serve.

Employee Training and Awareness

Conduent's Employee Training and Awareness program is a cornerstone of our commitment to data security, particularly concerning the protection and encryption of PHI. Our program verifies that all employees understand their role in safeguarding data through comprehensive, role-specific training modules.

New hires receive immediate training upon joining, emphasizing the critical nature of data security from day one. Annual refresher courses, supplemented with periodic updates on emerging threats and evolving best practices, reinforce this foundational knowledge.

We employ diverse training methodologies, including e-learning, workshops, and simulation exercises to cater to different learning preferences and allows for thorough comprehension. Our program also includes assessments to verify understanding and retention, verifying that employees are not only aware of but also proficient in applying our data security standards.

By fostering a culture of continuous learning and vigilance, Conduent confirms that our workforce remains a strong line of defense in protecting the sensitive information with which we are entrusted. This commitment extends beyond mere compliance, embodying our dedication to excellence and trust in handling PHI.

Monitoring and Auditing

To assure the efficacy and compliance of its encryption standards, Conduent has instituted a comprehensive monitoring and auditing regimen. This includes regular assessments of encryption protocols in action, verification of adherence to policy standards, and evaluations of the overall security posture. Insights gained from these activities inform continuous improvement and help maintain Conduent's commitment to best-in-class encryption practices.

Incident Response and Reporting

In the event of a security incident, Conduent has established protocols to respond swiftly and effectively. The incident response plan includes immediate containment strategies, thorough investigation procedures, and clear reporting channels. This approach allows for any potential breach to be addressed with the utmost urgency and efficacy, minimizing impacts and providing key learnings for future prevention.

We are committed to an immediate and structured response upon the identification of any security incident or data breach, especially those involving PHI or PII data. Our incident response protocol mandates rapid notification to the State, in full compliance with HIPAA requirements. We thoroughly assess the extent of the breach and activate detailed incident response strategies to address and rectify the underlying issues. Through a multifaceted approach involving planning, ongoing monitoring, and thorough reporting, we verify compliance with all pertinent federal legislation.

Our goal is to not only address the immediate concerns but also fortify our systems against future vulnerabilities, maintaining an unwavering commitment to data protection and regulatory

compliance. In case of a HIPAA breach, we not only notify the DOAS and other States promptly but also collaborate to refine the breach reporting process. This process, integral to our Communications Management Plan, makes certain that each step – from the initial breach discovery to the following investigation, and to the design and implementation of corrective measures – is accurately documented and completed.

Continuous Improvement

Acknowledging the dynamic nature of cybersecurity threats, Conduent is committed to the ongoing enhancement of its encryption practices. The continuous improvement program incorporates feedback from various sources, including audit results, incident analyses, and industry developments, to refine and evolve encryption strategies.

Our operational focus includes updating relevant stakeholders – providers, partners, and vendors – on policy shifts and system updates to provide smooth transitions and continuity. Conduent maintains optimal staffing levels, even after-hours, aligning with call volume trends to meet all service level agreements. Our resource allocation covers all operational aspects, verifying readiness and compliance with training and maintenance schedules.

We advocate for "application design over infrastructure" to leverage system resources effectively, prioritizing uptime and service reliability. Nevertheless, we prepare for unforeseen events with vigorous continuity and disaster recovery strategies, thereby providing service resilience and reliability.

Scheduled maintenance activities are precisely planned, aligning with State-approved updates, reinforcing our commitment to operational consistency and excellence, and upholding our promise of dependable, efficient service throughout our engagement.

Through its comprehensive encryption verification methods and unwavering commitment to data security, Conduent exemplifies leadership in protecting PHI. By adhering to stringent standards, fostering a culture of continuous learning, and proactively adapting to the cybersecurity landscape, Conduent upholds its pledge to safeguard sensitive health information, demonstrating its dedication to clients, patients, and the healthcare industry at large.

11.	Bookmark Title: MSQ11 – Data Mining Narrative description is limited to five (5) pages, not including the required supporting material. Describe in detail the Data Mining tool(s) and strategy that will be used to identify patterns of fraud, waste and abuse for field and desk audits as stated in Attachment H - Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 4.6 Data Mining.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWAA services and provide a compliant narrative response: Attachment H - Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work, Section 4.6 Data Mining.

Conduent leverages advanced data mining tools and strategies to identify patterns of FWA within healthcare systems, focusing on enhancing the effectiveness and efficiency of field and desk audits. This comprehensive approach not only safeguards resources but also verifies the integrity and accountability of healthcare programs for DOAS and other States.

Data Mining Strategy

Data mining at Conduent is integral to detecting FWA, utilizing sophisticated analytics to uncover hidden patterns and anomalies in vast datasets. By identifying these patterns, Conduent can proactively address potential issues, optimizing the audit process and safeguarding healthcare program integrity.

Conduent's strategy involves a detailed, stepwise approach to data analysis, beginning with the identification and definition of potential data quality issues. This structured methodology provides targeted and effective analysis that enhances the accuracy of FWA detection.

[redacted]

Data Mining Tools

Conduent employs a variety of advanced tools, including the Cross-Industry Standard Process for Data Mining (CRISP-DM) methodology, to confirm comprehensive and effective data analysis. This approach supports the entire data mining process, from understanding business and data requirements to algorithm development and evaluation.

We effectively apply our tools to uncover FWA patterns for DOAS and other States. This framework guides our team through understanding business objectives, data preparation, model building, deployment, and continuous improvement through analysis and actionable insights.

The CRISP-DM process framework anchors our toolset and facilitates a comprehensive end-to-end data mining strategy. It is a widely used methodology in data mining that provides a structured approach to planning and executing data mining projects. The process includes six phases:



The CRISP-DM process framework anchors our toolset, facilitating a comprehensive, end-to-end data mining strategy that confirms thorough analysis and actionable insights. This framework guides our team through understanding business objectives, data preparation, model building, deployment, and continuous improvement, verifying our tools are effectively applied to uncover FWA patterns.

Advanced analytical tools, including predictive modeling and machine learning algorithms, enable deep dives into varied data types, from outpatient pharmacy claims to complex hospital provider data, verifying robust surveillance and pattern recognition. These tools support the dynamic nature of healthcare data, accommodating new trends and evolving fraud schemes with agility and precision, thereby strengthening our FWA detection capabilities.

Algorithm Development and Maintenance

Conduent's algorithms are continuously refined and adapted to respond to emerging FWA patterns and trends so that our detection methods remain effective and relevant. This process includes initial algorithm design, extensive testing against diverse data sets, and iterative refinement based on performance feedback.

By continuously updating algorithms with new data and emerging fraud patterns, Conduent assures that our tools stay effective and relevant for DOAS and other States. To make sure that our data mining remains at the forefront of FWA prevention, maintenance involves regular algorithm evaluations, adjusting to healthcare industry changes, and incorporating stakeholder feedback to enhance detection capabilities.

Desk and Field Audit Integration

Data mining results are integrated into Conduent's audit workflows, enhancing the selection process for audit targets, as well as improving the overall efficiency and effectiveness of audit activities. This integration includes desk audit functions configured to State-specific claims, adding depth to the audit process. Sophisticated data analytics are used to identify high-risk areas or anomalies that suggest potential FWA. These identified issues are then prioritized and added to the audit schedules, giving auditors precise, data-driven targets.

Our integration process adapts to the changing landscape of healthcare fraud, making both desk and field audits more targeted and efficient. Additionally, the results from these audits are fed back into the data mining system, which helps continuously improve and refine the detection algorithms. Through this process, it allows for both desk and field audits to be more effective, letting auditors focus on the most suspicious activities.

Reporting and Monitoring

Reports are critical for evaluating the success of the data mining strategy in identifying potential fraud, waste, and abuse cases. Conduent maintains a full reporting system to monitor data mining outcomes, allowing for continuous evaluation and improvement of our strategies and methodologies.

This process involves creating detailed reports that highlight patterns, trends, and anomalies detected, offering insights into the effectiveness of the data mining efforts. Regular monitoring verifies that any new or evolving trends are quickly identified and addressed, thereby maintaining the value and relevance of the data mining processes. This continual evaluation helps in refining the data mining models and adapting strategies to confirm sustained performance and compliance with regulatory standards.

Compliance and Continuous Updates

Adhering to state and federal regulations, Conduent regularly updates its data mining tools and strategies to align with evolving standards and best practices for optimal FWA detection for DOAS and other States. Continuous learning from ongoing operations and external sources informs the enhancement of tools and processes, assuring Conduent's data mining practices are always at the forefront of technological and regulatory developments.

By significantly enhancing the ability to detect and prevent FWA, our PFWAA Services improve the efficiency and effectiveness of audits and contribute to the overall integrity and accountability of healthcare programs for DOAS and other States. Our approach emphasizes a commitment to leveraging technology and analytics to protect healthcare resources and confirm the delivery of quality care.

12.	Bookmark Title: MSQ12 – Staffing Narrative description is limited to five (5) pages, exclusive of organizational chart(s) and Subcontractor contract(s) or letter(s) of agreement, if applicable. Provide a narrative description of the proposed staffing plan that details policies, plans and staffing strategies. The proposed plan must include the following: a. Organizational charts that provide a complete and detailed description of the proposed organizational structure the Supplier will use, including Subcontractors and how they fit into the Supplier's overall organizational structure. b. Roles and responsibilities of staff. c. Job titles and the requisite qualifications, skills, and credentials, including clinical licensures relevant to this Contract. If Subcontractors will be used, provide the following: a. Subcontractor's name and address. b. Roles and responsibilities to be delegated to the Subcontractor for purposes of this Contract. c. Subcontractor's qualifications to perform these roles and responsibilities. d. Copy of the Subcontractor contract; the State will accept a letter of agreement with a prospective Subcontractor pending formalization of a final contract with details relevant to "c" in this section. Refer to Attachment H - Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work and Attachment C - Common Scope Requirements and Security Standards, Sections 2.15 Staff Management and 3 Staffing.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for FWA services and provide a compliant narrative response with requirements laid out in Attachment H – Fraud, Waste, and Abuse (FWA) Audit Services Scope of Work and Attachment C – Common Scope Requirements and Security Standards, Sections 2.15 Staff Management and 3 Staffing.

Since our company's inception, we have entered Medicaid contracts directly with our Medicaid customers. As a long-standing Medicaid ally, our Medicaid PBM solutions and spirit of innovation are directly tied to our contracts and meeting the needs of our state partners. We bring more than **30 years of direct Medicaid experience**; we have institutionalized the expertise, skills, and understanding of the Medicaid mission enabling Conduent to deliver the resources necessary to perform a seamless implementation and provide quality service throughout the contract term.

We are a collaborative, innovative, flexible, and customer-oriented partner, that can deliver a high performing Pharmacy solution that meets Georgia Department of Administrative Services (DOAS) and other NASPO States' current and future needs.

In this section, we present our staffing strategies, policies and roles, responsibilities of key staff, and proposed organizational structure for this project.

Staffing Plan

Conduent's staffing plan aligns with the PMBOK Guide processes for Resource Management. The plan establishes the level of effort for each task and phase of the FWA Audit Services project. It includes proven strategies for both monitoring and improving staff performance; helps us to continually meet the organizational and staffing needs of the project; and supports quality performance. Our overall process flow for resource management is shown in Figure W.12-1.



Figure W.12-1. Resource Management Process Flow
Our approach to resource management results in the right number and type of staff to accomplish project objectives.

The staffing plan helps Conduent identify the individuals that are assigned task ownership and responsibilities in the Project Work Plan. The roles and responsibilities, by resource type, are then documented throughout each of the individual deliverable plans. As the staffing plan establishes the appropriate staffing levels to fully support all operational requirements, it is a dynamic and constantly evolving project management tool throughout the project to evaluate current levels of services provided, the future level of services needed or requested, and the necessary staffing updates required to support those activities. It also details how staffing levels might be organized and physically located to provide optimal support to the FWA Audit Services project and the State. Additionally, the staffing plan identifies the tools and processes we use to screen available staff and fill positions and vacancies.

Conduent Staffing Plan Highlights

- Provides a matrix of all assigned staff and responsibilities
- Includes Conduent and State staffing levels for every phase of the project
- Approach to providing consistent staffing levels
- Staffing procedures, including replacing vacancies

Staffing Strategies and Procedures

Our staffing goals for the project reflect our overall policies of providing experienced and knowledgeable staff to avoid any significant learning curve. Conduent provides staff members who are thoroughly committed to the success of the implementation and ongoing operational management of the project. If applicable, we interview incumbent staff and make employment offers to individuals who meet our high standards. Staffing strategies and our plan include the following foundational components:

- Staffing strategies designed to bolster our ability to ensure minimal to zero impact on the end-users and operational staff during any transitions.
  - The management, change management, and outward-facing staff are trained to be sensitive to end-users' natural reluctance to change.
- Staffing plan outline of our process for identifying resource needs accurately and meeting such needs adequately.
  - All resource needs are tracked and monitored in a Staffing Allocation Matrix that provides the necessary information for a project to schedule resources effectively.
- Staffing strategies that focus on long-term retention and employee engagement

It is not only important to have skilled resources on the project; **it is just as important to keep them engaged for the long-term**. The Conduent approach contains processes for developing and monitoring resources throughout the project life cycle. Whether it's continuous training, performance reviews, resource recognition, or scheduling, the staffing plan outlines detailed processes and references any related work products that can be utilized to achieve success in human resource management.

To acquire the most skilled and experienced resources to serve the project, management has the option to use either an internal recruiter or a partnering firm, with specific processes outlined for both routes. Once the staff members are acquired, the project manager has various resources at his or her disposal to orient the new team members accordingly. These resources include a corporate Orientation Guide and a project-specific training processes, as well as an Onboarding Checklist and a variety of kick-off presentation templates. All these references ensure the resource is ready to engage with and contribute to the project as soon as possible.

a. Organizational Structure

For Georgia's FWA Audit Services project, Conduent brings industry experts with extensive experience operating Pharmacy Audit and Claims Review projects, with appropriate and expert oversight and support throughout the life of the contract. Our knowledgeable and proactive staff understands how to turn data from your systems into actionable information. We are committed to providing the Georgia Department of Administrative Services (DOAS) and other NASPO States

with the right number and mix of staff, to deliver smooth operation of the FWA Audit Services project.

Our organizational chart, Figure W.12-2, provides the proposed organizational structure of the Conduent FWA Audit Services team:



Figure W.12-2. Fraud, Waste and Abuse Module Organizational Chart
Our most efficient staffing structure, where lines of responsibilities and lines of communication are clear and direct.

Our staffing approach addresses the key components necessary to drive a successful implementation. This includes employing a strong, disciplined, and qualified project management staff that is committed to working in collaboration with the Department. We base our staffing plan on our previous experience with successful implementations. We work closely with DOAS and other States to tailor this plan so that critical staff members are available as needed.

The Account Manager provides oversight and management of the three primary functional areas:

1. Quality & Reporting
2. Delivery
3. Clinical

Each functional area includes a lead staff member with responsibility for daily workflows and performance monitoring.

b. Roles and Responsibilities, c. Job Titles and Qualifications

In Table W.12-1, we provide the roles, responsibilities, and required qualifications of key and critical management staff for this Project. Additional key staff will be identified at the Participating Addendum level.

Table W.12-1. Conduent FWA Audit Services: Key and Critical Staff Roles, Responsibilities and Required Qualifications

Role	Responsibilities and *Required Qualifications*
Account Manager	• Serves as the primary point of contact for all Contract management, Conduent performance management, and escalations • Conducts audits and reviews to ensure compliance with all applicable FWA regulations • Manages and train staff on FWA policies and procedures • Provides SLA support to DOAS and other NASPO Participating Entities as defined throughout this eRFP • *10 years of experience managing large service and system contracts* • *3 years of experience with stakeholder engagement or customer experience*
SE Operations Manager, FWAA	• Oversight of key Software Engineering resources for operations team • Respond to internal team for issues or support • Maintenance and support for CMdS solution • During operations, serves as the single point of contact for system issues • Leads and coordinates Conduent's operations activities • *Bachelor's degree from an accredited university* • *Minimum 5 years of experience managing large delivery teams*
Project Manager, DDI	• Manages planning, design, testing and implementation of the solution • Ensures that all system design and development is performed in accordance with the proposed SDLC • Initiates recommendations to the Department for system application improvements • Implements and oversees processes that accurately estimate design and development efforts • *Bachelor's degree in computer applications* • *Minimum of 10 years of work experience in related field with eight years in managing other resources* • *Has prior experience in public sector healthcare system implementation projects* • *PMP Certification preferred.*
Project Manager, Delivery	• Serves as a change agent focused on end-to-end quality assurance and Lean/Six Sigma (LSS) initiatives across all product/service lines and company deliverables • Creates effective and sustainable defect-remediation plans • Implements appropriate controls and measures (e.g., statistical process control [SPC], key performance indicators [KPIs]) to help process owners maintain improvements • *Bachelor's degree or over eight years previous work experience required* • *2 years of previous project management work experience preferred*
FWAA Clinician, Clinical Lead	• Develop operational and clinical policies and procedures for FWA Audit services, with a focus on pharmacy lock-in • Review pharmacy and medical utilization of Members to identify areas of concern for both Members and Providers • Manage annual case review process of lock-in Member's utilization

	• *RPh required, Doctor of Pharmacy (PharmD) degree from an accredited college or university preferred* • *Active pharmacist licensure in good standing, with no history of disciplinary actions* • *Completion of specific training related to FWA, general compliance, and cultural competency*

Supporting the key and critical staffing roles detailed above, Table W.12-2 provides additional information for all proposed resources in our Quality & Reporting, Operations Delivery, and Clinical functional areas.

Table W.12-2. Operations Support Staff

Operational Area	Role/s	Responsibilities
Quality & Reporting	Quality Assurance Analyst	Concurrent Reviews Manages review procedures
Delivery	Business Analyst	Grievances
	DME Analyst	Audit and Analysis, DME
	Grievances Analyst	Grievances, appeals, administrative services, documentation
	Desk and Field Auditors	FWA Audits, Call line support, provider support
Clinical	Pharmacy Technicians (CPhT)	FWA Desk Audits, Pharmacy Lock In, Letters and communication materials
	DME Clinicians	Clinical Support; DME

Subcontractors

Conduent will be responsible for all services as outlined in this RFP response. We will not use a subcontractor to perform the requirements for the FWA Audit Services project.

13.	Bookmark Title: MSQ13 – Project Stages and Phases Narrative description is limited to five (5) pages. Demonstrate your understanding of the Project Stages, Project Phases, timeline, expectations, and responsibilities as outlined in the Attachment C - Common Scope Requirements and Security Standards, Section 2.2 Project Stages and Project Phases. If your plans for the proposed services differ from the suggested outline, please explain the differences and how the proposed plan is a better fit for the State's needs. Include any best practices and lessons learned that may be applied in the execution of these services and identify any additional proposed Milestones for the project.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWAA services and provide a compliant narrative response: Attachment C – Common Scope Requirements and Security Standards, Section 2.2 Project Stages and Project Phases.

Conduent has a deep understanding of the Medicaid environment, pharmacy systems, healthcare data, and what it takes to implement and operate the Pharmacy Fraud, Waste, and Abuse Audit Services (PFWAA) module.

To deliver the functionality this RFP requires, we implement and operate a set of modules from our CMdS FWA solution These modules include all the functionality required for PFWAA detection, pharmacy lock-in, desk and field audits, and reporting.

Approach to Design, Development, and Implementation (DDI) Project Stage

Unlike solutions offered by some of our competitors, CMdS was built specifically for Medicaid, by Medicaid experts. This modern, up-to-date Medicaid foundation enables us to meet your requirements right out of the box. This means no costly, ground-up development work is needed. Our highly configurable CMdS solution enables us to implement the PFWAA Services project in just five months as depicted in Figure W.13-1.



Figure W.13-1. High-Level Implementation Timeline
Conduent's highly configurable CMdS FWA solution can be implemented in just five months.

Our DDI phases closely match the required phases identified in the NASPO RFP; however, our solution does not require custom design or development to meet your requirements. **This key benefit reduces implementation time and costs.**

In the sections below, Conduent identifies key activities within each DDI phase.

Project Planning and Startup. During this phase, we hold a project kickoff meeting with the State and all PFWAA stakeholders to introduce key project staff, review project goals, provide a system overview, and discuss other topics related to the new PFWAA Services solution. We also work closely with you to finalize the project schedule and confirm the project scope of work and requirements.

Figure W.13-2 shows the tasks conducted during the Project Planning and Startup phase. Completing these tasks helps our team establish what needs to be accomplished during the project and define processes for monitoring, tracking, and recording work.

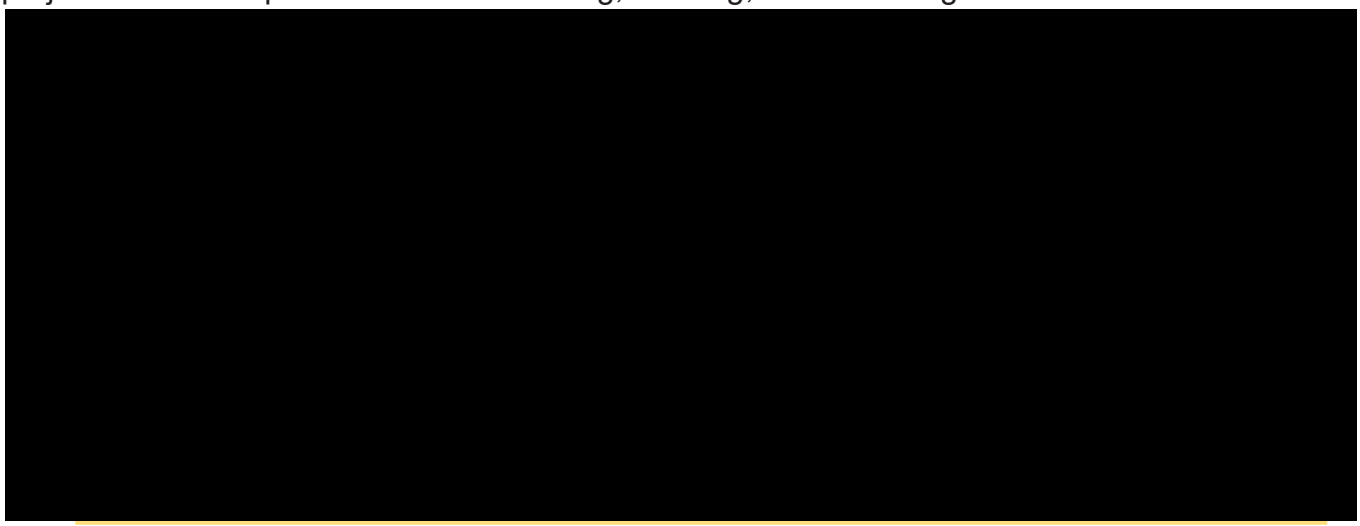


Figure W.13-2. Project Planning and Startup Phase
Project planning and startup phase tasks help our team define project objectives, and processes for monitoring, tracking, and recording work.

Design, Configuration, and Testing. During this phase, we begin data migration and configure the baseline CMdS solution to become a state-specific PFWAA solution. We apply an iterative approach to deliver functionality within multiple workstreams allowing different teams to work simultaneously on the project. This approach helps us streamline the solution standup process. Recommended workstreams include the following:

- Interfaces
- Data Conversion/Migration
- Pharmacy Lock-in
- Desk and Field Audits
- Reporting

Using this approach, we can quickly establish interfaces with external systems, document data layouts and definitions, configure reports, and learn about recent audits and areas of concern. We also hold knowledge transfer sessions with the State and incumbent vendor to understand and

integrate into your program environment. We gather information on recent audits, state policy, discrepancy codes, and pharmacy lock-ins.

Operational Readiness and Production Cutover. To prepare for go-live, Conduent conducts an Operational Readiness Review (ORR) to fully validate the PFWAA solution. We perform final data conversion/migration to confirm that our system has the latest program data.

Before launching the solution into operations, the Conduent and State leadership teams hold a Go/No-Go meeting to review implementation activities and confirm that the systems, processes, policies, and support infrastructure are ready to provide the PFWAA functionality in operations. We begin operations following written approval from the State. You can be confident that our implementation approach accounts for the entire solution, from technology to people and processes.

Approach to Operations and Maintenance (O&M) Project Stage

Our operations approach provides best practices for managing, overseeing, and continually improving the processes and procedures used for operational activities and maintenance.

Trusted Experience

Our recommended O&M phases match the required phases identified in the NASPO RFP. In the sections below, Conduent identifies key activities within each O&M phase.

Initial Operations. Once the solution enters operations, Conduent provides a warranty period to confirm our solution functions according to your requirements. During this time, we:

- Identify any nonconformances and document and log them as defects.
- Remediate defects to confirm the system functions according to design.
- Correct defects at no charge.

Operations. We bring a 360-degree support and maintenance structure, as depicted in Figure W.13-3 that preserves the achievements gained during the implementation. We provide ongoing maintenance of the PFWAA solution to meet State requirements and expectations.

Table W.13-1 highlights key services provided during PFWAA operations.



Figure W.13-3. Conduent's Comprehensive Operational Support
Our operational support provides our clients with access to the resources and tools needed to meet their requirements and goals throughout the Operations Phase.

Table W.13-1. Highlights of Conduent CMdS FWA Solution

Business Area	Conduent's Services
Seamless Integration	[redacted]
Fraud Waste and Abuse Detection	
Pharmacy Audits	
Reporting	

Our operations approach is grounded in the principles we follow starting from the first tasks of the Project Planning and Startup Phase and continuing through the life of the engagement. Our focus remains centered on delivering and maintaining business processes that meet your needs.

Turnover and Contract Closeout. Our approach to project closeout and turnover focuses on customer satisfaction with little to no disruption in services. Our Turnover Team completes turnover tasks efficiently and professionally, in accordance with your requirements and preferences. Conduent strives for a "top-down" turnover, in which all aspects of the project – including operations, services, and module components – are identified, detailed, and turned over to the State or the successor contractor in an orderly fashion.

Best Practices and Lessons Learned

Conduent offers significant experience implementing large, complex government healthcare projects. We are proud pioneers in this space – providing healthcare solutions to a wide variety of federal, state, and local government clients for over 50 years. This experience gives us the resources, know-how, and best-practices to implement the solution smoothly, cost-efficiently, and with minimal risk.

Conduent's extensive history of successfully planning, organizing, and managing government healthcare solutions has taught us many lessons about the keys to a successful transition, implementation, and operations. While some factors vary from project to project, many principles remain constant. We use the best practices identified below to help develop our implementation and operations approach for the project.

- **Foster a Collaborative Partnership with our Clients.** Building a strong relationship between Conduent, the State, and your vendors means we communicate frequently and honestly. Regularly scheduled reporting, status meetings, and governance meetings help us continuously align on project goals and expectations.

- **Establish a Strong Foundation.** Using the Conduent's Quality Management System (QMS) and supporting tools such as Microsoft SharePoint and Azure DevOps, we hit the ground running with the resources needed to guide the project through its early stages.
- **Use Best Practices and Lessons Learned.** Incorporating best practices from the Project Management Institute's PMBOK Guide, our CMMI level 3 appraisal, as well as lessons learned on other projects, means our team implements an established PMM in alignment with your requirements.
- **Document and Execute the Project Management Plan.** Maintaining State-approved project management documentation means all project team members know their responsibilities for completing project tasks.
- **Communication Early, Often, and Transparently with All Project Stakeholders.** Proactively identifying risks and issues, escalating problems when necessary, and keeping other modular vendors informed enables our management team to keep the project on track and prepare stakeholders for the new solution.
- **Infuse Quality into all Aspects of the Project.** Peer reviews, document quality reviews, end-to-end testing, and user acceptance testing all contribute to a more aligned and accurate project and solution.
- **Establish, Maintain, and Monitor the Scope Baseline.** By establishing a solid scope baseline, we control changes when they arise and keep the project schedule and budget on track.
- **Monitor the Critical Path**. Having a predictive Project Schedule is only possible if the tasks, dependencies, duration, and resources are sequenced, resourced, and scheduled to align with project priorities.
- **Plan for Change.** Our PMM encompasses key change topics such as system changes, documentation changes, and also organizational change methods. By planning for all aspects of change up front, we can address the attributes of people, process, and technology that make change lasting and successful.
- **Training.** Training is the key to make a great plan succeed. Create stakeholder groups, train them accordingly, and empower them with the knowledge and know-how that makes a difference. Test and build skills frequently and repeatedly.
- **Commitment to Continuous Improvement.** Through process monitoring, operational quality audits, a "suggestion box," and more, we embrace the changes that improve delivery, quality, and efficiency to meet program objectives.

Our approach to implementation and operations incorporates the best practices detailed above, the "best of" technology, and experience garnered over decades of implementation and operations experience.

14.	Bookmark Title: MSQ14 – Transition & Integration Narrative description is limited to three (3) pages. Describe how you will handle the transition activities from the incumbent Fraud, Waste, and Abuse vendor. Include the value-add of your approach and techniques in terms of cost savings, quality improvement, and/or savings to the project schedule for the State. Describe your integration approach with the Pharmacy Benefit Administrator vendor and its system.

Supplier Response

Transition Overview

Our transition approach embraces cooperation with the State, incumbent PFWAA vendor, and PBA vendor to support a collaborative transition period and minimize disruption to program stakeholders. We carefully prepare, plan, oversee, and execute transition activities to advance this critical phase smoothly, with minimal adverse impact on program services.

We designate a Conduent Project Manager and Implementation Lead at the beginning of the project to minimize the potential for disruptions. The Project Manager is responsible for the completion of all Conduent transition activities, serving as the primary point of contact for the State, incumbent vendor, and PBA vendor. The Implementation Lead coordinates the PFWAA solution establishment, including software installation, site preparation (if needed), scheduling, and data migration activities.

Transition Plan. Working with the State, we develop a Transition Plan to fully document the approach to PFWAA transition and cutover. The plan provides the framework, formats, content, and timelines to conduct an orderly, controlled, and complete transition that minimizes processing and service disruption.

- **Orderly.** Our transition approach incorporates State-specific requirements and follows our standard transition structure, beginning with technical and operations workgroups that plan and execute transition activities. Our Project Manager identifies and schedules knowledge transfer sessions and cutover activities to support a comprehensive transition. We work with the State and incumbent vendor to define and agree upon transition processes and timelines so that these activities occur with predictability and precision.
- **Controlled.** We apply the same project management rigor and progress monitoring in all project phases including transition. We work with the State, incumbent vendor, and PBA vendor to implement a governance model that includes a management team and an oversight committee to carefully track progress against the planned schedule, mitigate risks, handle escalations, review data, and monitor the completion of transition activities. Through these levels of governance, we proactively identify, track, and report on transition risks and issues, noting status, ownership, and resolution dates for each item.
- **Complete.** Our Transition Plan covers a variety of topics that include data migration, knowledge transfer, and system cutover activities. We maintain an inventory of project deliverables, contract and operational documents, work-in-process, and other assets. We track information, training, and knowledge that we must gather from the incumbent vendor and the

information that we need to share with the State or other modular vendors as part of the transition. We plan and track transition activities against these inventories to make certain all operational components are ready for implementation.

Our approach to transitioning PFWAA services from the current vendor supports a transition with minimal disruption to program stakeholders. We emphasize the need to collaborate the State to understand your current program environment, maximize your familiarity with the new solution, facilitate approvals, and mitigate risks.

Knowledge Transfer. To support a seamless transition of PFWAA services, we schedule knowledge transfer sessions with the State and the incumbent vendor to gather current program information. We also work with the incumbent vendor and PBA vendor (as needed) to document the following information:

- Interfaces and specifications
- Data layouts
- Data definitions
- Letter templates
- Desk and field audits completed within the last two years
- Discrepancy codes
- Reports
- State-specific program information

This information helps us understand the current program environment, identify areas for potential improvements, and facilitate a transition that minimizes disruption to program stakeholders. When possible, we request that vendors provide current documentation before the knowledge transfer meeting allowing our team to formulate questions and facilitate discussions.

Integration with Pharmacy Benefit Administrator. We work closely with the State and PBA vendor to establish protocols, schedules, rules, and error-handling processes for each interface. This includes the definition of the message structure and protocols that govern the exchange of data between systems; the identification of the communication path for data to flow between the systems; completion times, timing windows, and inbound definitions, as well as delivery requirements for outbound interfaces.

We complete an Interface Control Document (IDC) for each required interface. The ICD captures the information needed to establish each interface, including definition, file layout, and specification as well as data assembly (envelope), data elements, communications, and security. We review the ICD for alignment with DOAS and other States' requirements and update it as required. Figure W.14-1 shows an excerpt from our ICD.

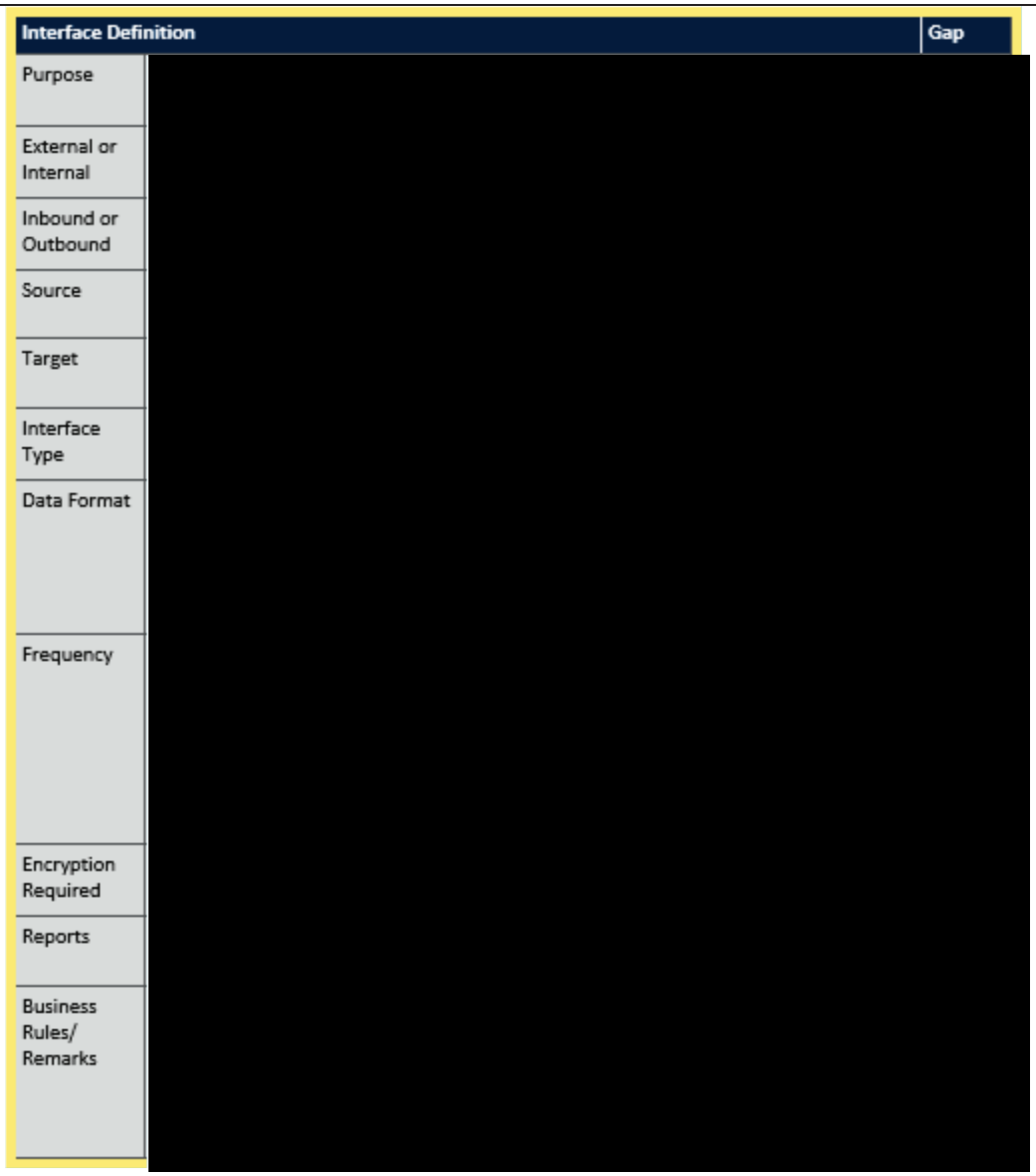


Figure W.14-1. Interface Control Document Excerpt
Our ICD template helps facilitate the flow of data between the PBA and PFWAA vendors.

Throughout the project, Conduent makes the necessary modifications to current data interfaces and develops new interfaces as necessary to meet specifications.

We test interfaces both internally and externally with business partners, to achieve true end-to-end functionality and put the measures in place for handling file receipt errors and other failures.

15.	Bookmark Title: MSQ15 - Project Management Bookmark Title for Supporting Material: ➢ MSQ15.1 - Project Schedule/Project Work Plan (Sample) ➢ MSQ15.2 - WBS tasks and Project Outputs (Sample) ➢ MSQ15.3 - Implementation Plan (Sample) ➢ MSQ15.4 - Quality Management Plan (Sample) ➢ MSQ15.5 - Requirements Management Plan (Sample) ➢ MSQ15.6 - Change Management Plan (Sample) ➢ MSQ15.7 - Risk Management Plan (Sample) ➢ MSQ15.8 - Communications Management Plan (Sample) ➢ MSQ15.9 - Integration Plan (Sample) ➢ MSQ15.10 - Operations & Maintenance Plan (Sample) ➢ MSQ15.11 - Training Plan (Sample) ➢ MSQ15.12 - Cost Management Plan (Sample) ➢ MSQ15.13 - Stakeholder Management Plan (Sample) Narrative description is limited to five (5) Pages, not including the required supporting material. Provide a description of the project management approach, including, but not limited to, the methodology and implementation of the system to be used for monitoring and control of scope, schedule, and cost. Additionally, describe any previous experience managing similar projects using the Project Management Lifecycle (PMLC) and Project Management Book of Knowledge (PMBOK) throughout the life of the contract. Refer to Attachment C - Common Scope Requirements and Security Standards, Section 2 Project Organization and Management. In the Supporting Material, include a draft or sample project management plan representative of this project. In your narrative response, explicitly identify any differences between the State's project management approach from your proposed approach, including all responsibilities.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for PFWAA services and provide a compliant narrative response: Attachment C – Common Scope Requirements and Security Standards, Section 2 Project Organization.

Managing Start-up with Conduent's Quality Management System

Conduent's project management and service delivery approach is based on our innovative Quality Management System (QMS) – a collection of turnkey plans, processes, and procedures that enable our team to reliably plan, execute, monitor, control, and close project activities in alignment with your requirements and standards. The QMS includes project management, system development, operations, and training processes based on our experience and industry standards such as:

- Project Management Institute's A Guide to the Project Management Body of Knowledge (PMBOK® Guide)
- Project Management Lifecycle (PMLC)

- Software Engineering Institute's (SEI) Capability Maturity Model Integration (CMMI®)
- CMS Certification and Testing Framework

This holistic approach enables our team to execute project tasks, while closely monitoring and controlling scope, schedule, and costs. Advocating the standardized and consistent processes in our QMS, not only allows us to achieve a successful implementation but also enables us to repeat these processes to support your operations and future system enhancements.

Table W.15-1 provides an overview of the key areas within our QMS, as well as the benefits the QMS provides to the State and your stakeholders.

Table W.15-1. QMS Methodology Overview

QMS Methodology	Key Attributes and Benefits
Project Management Methodology (PMM)	[redacted]
System Development Methodology (SDM)	
Training Methodology	
Operations Methodology	

Our QMS processes closely align with RFP requirements and industry standards and best practices. **This initial alignment means Conduent can meet your project management requirements through only minor modifications to our existing project management processes.**

Project Management Methodology

To guide the implementation of the PFWAA Project, we offer a comprehensive PMM that includes processes, procedures, templates, tools, training, and best practices.

Our PMM, documented in our project management plans, defines key project management processes, roles, responsibilities, and metrics required to execute and monitor all project activities. Our project management plans are standardized and easily configurable, meaning we can quickly tailor the plans to align with your project management requirements. Applying our PMM helps us monitor and control the project to keep it on schedule, on budget, and within scope.

We set aside time during project startup and planning to review each project management plan with you. We collaborate with the State and your partners to configure our processes and supporting artifacts. We submit the completed documentation to the State for review, feedback, and approval to align project processes and goals. We execute these processes early in the project to set the stage for success.

We include several project management plan templates from our QMS in the supporting material section of this proposal, including:

- MSQ15.1 – Project Schedule/Project Work Plan (sample)
- MSQ15.2 – WBS tasks and Project Outputs (sample)
- MSQ15.3 – Implementation Plan (sample)
- MSQ15.4 – Quality Management Plan (sample)
- MSQ15.5 – Requirements Management Plan (sample)
- MSQ15.6 – Change Management Plan (sample)
- MSQ15.7 – Risk Management Plan (sample)
- MSQ15.8 – Communications Management Plan (sample)
- MSQ15.9 – Integration Plan (sample)
- MSQ15.10 – Operations & Maintenance Plan (sample)
- MSQ15.11 – Training Plan (sample)
- MSQ15.12 – Cost Management Plan (sample)
- MSQ15.13 – Stakeholder Management Plan (sample)

We work with you throughout the project to make incremental improvements to our processes and to align our documentation with the project's evolving needs.

Project Governance, Status Reporting, and Leadership Controls

Governance. We work collaboratively with the State to establish a project governance model that defines channels of communication and processes to monitor and control the project's schedule, scope, and costs. Our proactive approach to governance allows us to anticipate potential risks and issues, implement changes effectively, improve project performance, and achieve program objectives. Figure W.15-1 outlines our recommended governance approach for the project.



Figure W.15-1. Proposed Project Governance Model
Our governance model improves project outcomes by enabling communication, alignment, and monitoring across all levels, stakeholders, and vendors.

Our proposed governance model emphasizes the importance of providing necessary, fact-based information to State leadership for decision-making and issue escalation. Executive leadership draws on available data, opinions, and manager recommendations when rendering decisions and providing strategic direction.

Status Reporting. In alignment with our overall governance model, we work with the State early in the project to establish a weekly status meeting. We conduct status meetings with the State to review project status, risks, issues, action items, solution and staffing changes, recent deliverables, upcoming milestones, and schedule progress. We work with you to review and modify our status report template to meet your reporting requirements. Our Project Status Report Template includes:

- A description of the project's overall schedule, resources, and budget status
- Planned and actual deliverable start dates, end dates, and percent complete
- Work planned and completed during the reporting period
- Work planned to be completed for the upcoming reporting period
- Open and closed issues and risks, project changes, and testing status and metrics

As the project moves into operations, we adjust our reporting approach, tracking SLAs and operational performance to meet your program requirements. We agree in advance on operational performance standards and how these performance standards are tracked and reported. We provide progress reports and report any risks, problems, and Corrective Action Plans, if necessary, to provide a comprehensive view of our operational status.

Leadership Controls. Conduent leadership closely monitors implementation progress to keep our projects on time and under budget. Through weekly reporting, our leadership team ascertains the status of the project in key areas such as scope, schedule, budget, resources, technical performance, operational performance, and client satisfaction. This serves as both an early warning system, allowing our leadership team to quickly identify potential problems, and a pathway to problem resolution, supporting escalation and remediation before problems negatively impact project delivery.

Figure W.15-2 shows our project health repository dashboard, with sensitive client information redacted.



Figure W.15-2. Conduent Leadership Implementation Status Dashboard
The Implementation Status Dashboard allows executive leadership to view the health of each project and identify trends across implementations.

From this dashboard, leadership can drill down to specific project information as seen in Figure W.15-3. This detailed view provides additional information on each specific project, including an Executive Summary field that summarizes key tasks, activities, and escalations from the previous week. If a project is deemed to be in Yellow or Red status, the Project Manager must work with the executive leadership team to formulate a “Go to Green” plan. The Go to Green plan outlines a path to return the project to green status.

Depending on the type of problem, this could involve executive-level decision-making, additional resource allocations, re-baselining the schedule, identification of potential change requests to expand scope, or other forms of management intervention. Continuous engagement and collaboration between Conduent’s executive and project-level leadership helps to keep the project on track and address potential problems quickly.



Figure W.15-3. Conduent Leadership Project Status Detail
Detailed information on each implementation allows our leadership team to intervene quickly when potential problems arise.

Through accurate execution of our PMM, we generate work performance information and status reports that are informative, comprehensive, and transparent. This helps to keep both State and Conduent Leadership informed on project progress and ready to intervene if results deviate from expectations.

Our Proven Experience and Industry Standards

For years, we have worked with government healthcare agencies to implement systems and solutions that meet the needs and challenges of the evolving healthcare environment. We use our QMS on each implementation – incorporating industry standards and best practices from the PMLC and PMBOK Guide. These industry standards establish a foundation from which we build State-specific processes to monitor and control our projects. Recently, we have used these processes on projects including:

In addition, we also comply with the most important industry standard, CMS Streamlined Modular Certification (SMC). Our impeccable certification track record is a testament to our capability to adhere to industry standards and achieve our client's goals.

16.	Bookmark Title: MSQ16 – Role Understanding Narrative description is limited to five **(5)** pages. Describe your understanding of your role and responsibilities in the project, your relationship to the other resources and stakeholders involved, including the State's Project Management Office (PMO), or equivalent unit, Pharmacy Benefit Administrator (PBA) vendor, and Pharmacy Drug Rebate vendor. Describe how you will collaborate and provide leadership among the various resources and stakeholders and provide examples of past successes in a similar environment. Refer to Attachment C - Common Scope Requirements and Security Standards.

Supplier Response

In addition to the RFP requirements for this section, we have fully reviewed the following attachments in the development of our proposal for Pharmacy Fraud, Waste, and Abuse Audit Services, and provide a compliant narrative response with requirements laid out in Attachment C: Common Scope Requirements and Security Standards.

Conduent's innovative culture helps our clients focus on what matters most – improved health outcomes and cost-effective care. We help government healthcare programs by making data easily accessible to our partners, streamlining processes, meeting regulatory mandates, and controlling costs.

As a core tenant of our approach, we foster a collaborative partnership with our clients and program stakeholders. We provide leadership within our program area, support the needs of other stakeholders, share data and program insights, and establish project governance to oversee changes and implement improvements. We work with the DOAS and other States to seamlessly integrate into your Medicaid environment. Our experience in multi-vendor environments across the nation, from both Pharmacy and MMIS perspectives, positions us to partner, advise, and support your decision-making processes. Together we can anticipate challenges and identify opportunities for improvement initiatives and collaboration.

For example, to better enable integration among a variety of vendors, our systems are built on the principles of modularity, allowing us to integrate seamlessly through a single point of contact with disparate systems that are part of the DOAS' and other States' modular systems and solutions. We leverage innovative technological approaches to automate and streamline data exchanges between the different modules in a state's modular ecosystem. Our interfaces are all designed with a canonical data model design pattern to meet the integration requirements through the configuration of our pre-built interfaces instead of ground-up development during the design, development (DDI) stage. This provides a significant advantage in reducing the implementation risk and optimizing data flow across the program.

Expectations for Roles and Responsibilities

In Table W.16-1, we provide you with details on how our relationship with other vendors and project stakeholders help with the proper development of the project.

Table W.16-1. Roles and Responsibilities in the Project

Resources and Stakeholders	Relationship
State's Project Management Office (PMO)	Conduent coordinates with the States' PMO to establish and maintain the project management processes to help manage project work. We post all project management documentation, including risks, issues, action items, and decisions to the State's SharePoint site for PMO access. All our project plans conform to the templates, standards, and processes as defined by the State's PMO, and support and align with project management activities at the program level.
Pharmacy Benefit Administrator Vendor	Conduent will collaborate with the PBA vendor to provide, once approved by the State Program Integrity unit, discrepant Claims for reversal.
Pharmacy Drug Rebate Vendor	Conduent will collaborate with the Rebate vendor to receive information related to activities that identify potential fraud or abuse.

Success Stories

Over the years, we have worked in partnership with our customers and their partners to modernize their solutions and adhere to new or revised rules, regulations, policies, standards, and guidelines. A singular Conduent competitive advantage is our ability to work with our customers to identify and implement solutions for keeping patients safe, preventing drug misuse, and ensuring clients have access to the medications they need. We provide several success stories from our accounts across the nation specifically related to audit services, so that you can be confident of our ability and commitment to deliver professional, responsive services to our clients.

Onsite Audits – National Payer supporting Medicaid Members in Select States

Relationship Duration: 15+ years

- **The Challenge.** Internal audit team could not efficiently manage the volume
- **The Solution.** Client partnered with Conduent to conduct all of its onsite audits
- **The Result.** Client realized an estimated increase of $80 M more in recoveries since inception. Additionally, Conduent was awarded half of desk audit business – generating another $27M in recoveries.

Independent, Third-Party Audits – Blue Plan Supporting Medicaid Members

Relationship Duration 20+ years

- **The Challenge.** Current PBM audits were not recovering as much as the client had hoped, so the client looked to an independent vendor to help drive more recoveries
- **The Solution.** Client selected Conduent as their independent auditor due to their years of industry experience.
- **The Result.** Client was able to recover $53M+ over the past 15 years.

Audit Program – National PBM

Relationship Duration: 8+ years

- **The Challenge.** Internal audit team could not meet customer audits demands
- **The Solution.** Client partnered with Conduent to supplement the clients existing audit program
- **The Result.** Conduent fully outsources the audit program to Conduent with an ongoing relationship that provides exceptional results to the client and their customers.

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