

| Requirement Section | Requirement ID | Applies to which services | Requirement Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | HHS Tech Group Detailed Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| Compliance          | CMP01          | Applies to all            | The Supplier shall, upon request by the State or at the end of the contract, transfer or destroy all documentation in the custody of the Supplier. The Supplier shall provide the transferred records and data in a format agreed upon by the State.                                                                                                                                                                                                                                                                                                                                                                          | Confirmed. HHS Tech Group will deliver all agreed upon project artifacts and deliverables to the State using the agreed upon data format, in accordance with the agreed upon schedule. Any documents that need to be destroyed based on State guidelines will be destroyed or transferred to the State by HHS Tech Group in alignment with State protocols when the contract has ended.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Compliance          | CMP02          | Applies to all            | The Supplier shall notify the State in writing within twenty four (24) hours (or a timeframe as defined by the Agency) following initial detection of suspected fraud or abuse and provide supporting documentation.                                                                                                                                                                                                                                                                                                                                                                                                          | Confirmed. As a standard part of HHS Tech Group protocols, we will ensure prompt notification of any and all perceived, suspected, and/or detected fraud, waste, or abuse in the timeframe defined by the Agency. Supporting documentation will accompany all notifications and our team will remain available, providing prompt updates and additional information throughout the resolution period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Compliance          | CMP03          | Applies to all            | The Supplier shall adhere to data retention requirements cited in 45 CFR 164.316 and Administrative Rule 37.85.414. The agency may require a longer retention period on an exception basis to support ongoing business needs (e.g., TPL recovery and drug rebate).                                                                                                                                                                                                                                                                                                                                                            | Confirmed. The RyL solution satisfies all 45 CFR 164.316 and Administrative Rule 37.85.414 data retention requirements. Additionally, we can support a longer retention period as needed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Compliance          | CMP04          | Applies to all            | The Supplier shall have written policies governing access to, and duplication and dissemination of all individual or entity information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Confirmed. HHS Tech Group has strict established security policies in protocols in alignment with Federal standards and State-specific requirements. RyL is also a role-based access system requiring a secured user ID and password to gain access. Once logged in, all access visible and usable is controlled based on their role-based permissions. These controls will be reviewed with the Agency during the implementation to ensure adherence and alignment to your State-specific security policies.</p> <p>In addition, at a company level all data access is managed through Role-Based Access Control (RBAC) and all data is encrypted during transit and at rest. Role owners are responsible for managing and reviewing access granted to a specific role following the principle of least-privilege.</p> <p>Personnel changing responsibilities will have their old access removed and new access provisioned as appropriate for their new role, as approved by their new supervisor. Strict assignment to a single role prevents users from accumulating access over time.</p> <p>Finally, as part of the new hire process, all personnel are required to sign appropriate security and confidentiality agreements. Additionally, all personnel receive initial, ongoing, and as needed security training to ensure understanding and compliance of all security policies in place.</p> |
| Compliance          | CMP05          | Applies to all            | The Supplier shall comply with all sections of the Americans with Disabilities Act (ADA), Section 508 of the Rehabilitation Act and ensure user interface standards account for the various forms of colorblindness.                                                                                                                                                                                                                                                                                                                                                                                                          | Confirmed. We conduct ADA compliance checks using tools such as aXe and WAVE to ensure accessibility, including for colorblindness.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Compliance          | CMP06          | Applies to all            | The Supplier and its services, work products and final deliverables provided by the Supplier applicable to the services described in the scope of work shall be knowledgeable of and in compliance with pertinent State and Federal Statutes, CIO Promulgated Rules, State IT policies, rules, and standards for required system hardware, software and development tools and processes, and operational procedures when completed and accepted by the agency. The Supplier shall also be aware of upcoming changes to existing rules and regulations as well as new rules and regulations that may impact the scope of work. | Confirmed. As part of our standard procedures, HHS Tech Group regularly monitors all relevant State and Federal laws, policies, statutes, rules, and standards to ensure compliance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Compliance          | CMP07          | Applies to all            | The Supplier shall adhere to recognized best practices during the execution of the scope of work including the latest version of the National Institute of Standards and Technology (NIST) Special Publication (SP) 800 series related to cyber security.                                                                                                                                                                                                                                                                                                                                                                     | Confirmed. HHS Tech Group is committed to continually assessing and improving our ability to prevent, detect, and respond to cyber security incidents and threats. As such, we follow and align to the NIST SP 800 guidelines to properly identify, protect, detect, respond, and recover, ensuring proper cyber security measures are                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Compliance          | CMP08          | Applies to all            | The Supplier's solution shall have full integration of the MITA initiative with business, architecture and data required to support the State's healthcare programs.                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Confirmed. The RyL solution aligns with all CMS OBC and MITA standards and guidelines. The RyL solution is further configurable to support all Agency-specific needs and requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Compliance          | CMP09          | Applies to all            | The Supplier shall be knowledgeable of and support the agency to maintain compliance with the "to be" vision of MITA 3.0 Standards and Conditions-MITA Condition or the latest MITA version that requires states to align to and advance in MITA maturity for business, architecture and data.                                                                                                                                                                                                                                                                                                                                | <p>Confirmed. HHS Tech Group's Implementation Team and our RyL module bring extensive knowledge along with alignment to the MITA Standards and Conditions as well as the latest Outcomes-Based Certification (OBC) and the former MECT version. Our team will continue to review and align to the latest releases of standards and guidance from CMS throughout the lifetime of our contract, including:</p> <ul style="list-style-type: none"> <li>• Information Architecture</li> <li>• Standards and Conditions</li> <li>• Access and Delivery Protocols</li> <li>• Interface Requirements</li> <li>• Integration and Utility Guidance</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| Compliance          | CMP10          | Applies to all            | The Supplier shall be knowledgeable of and support the agency to maintain compliance with the "to be" vision of MITA 3.0 Standards and Conditions - Industry Standards Condition or the latest MITA version that requires states to align to and advance in MITA maturity for business, architecture and data. The Supplier shall ensure alignment with, and incorporation of, industry standards, HIPAA, privacy and transaction standards; accessibility standards, and standards that provide greater accessibility for individuals with disabilities and standards under the Affordable Care Act.                                                                              | Confirmed. The RyL solution is built to adhere to all MITA 3.0 Standards and Conditions as well as all standard industry regulations such as HIPAA, ADA 508 requirements, and rules from the ACA. Our UX Design Team ensures the usability of our system and the adaptability of the user interface to meet specific regulatory requirements and individual needs. This ensures not only support for people with disabilities, but also maximizes usability across all users, since ease of use is often the most critical feature in ensuring the solution implemented will be efficient and effective long-term.<br><br>As new guidance and changes to regulations occur throughout the term of the contract, HHS Tech Group will take a proactive approach to alerting the Agency. Our team will discuss any changes needed to the system in advance so that the module maintains continual adherence to all regulations, rules, and protocols. |
| Compliance          | CMP11          | Applies to all            | The Supplier shall be knowledgeable of and support the agency to maintain compliance with the "to be" vision of MITA 3.0 Standards and Conditions - Leverage Condition or the latest MITA version that requires states to align to and advance in MITA maturity for business, architecture and data. The Supplier shall promote sharing, leveraging, and reuse of healthcare technologies and systems within and among states.                                                                                                                                                                                                                                                     | Confirmed. The RyL solution is built to inherently promote sharing, leveraging, and reuse of its technology components and service layers. As a SaaS, COTS, and web-based solution, RyL is both flexible and adaptable to meet changes to State and Federal requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Compliance          | CMP12          | Applies to all            | The Supplier shall be knowledgeable of and support the agency to maintain compliance with the "to be" vision of MITA 3.0 Standards and Conditions - Modularity Standard or the latest MITA version that requires states to align to and advance in MITA maturity for business, architecture and data. The Supplier's solution shall use a modular, flexible approach to systems development, including the use of open interfaces and exposed Application Programming Interfaces (API); the separation of standardized business rule definitions from core programming; and the availability of standardized business rule definitions in both human and machine-readable formats. | Confirmed. To align with the modularity standards, RyL is built based on flexible, adaptable modern microservices architecture, with well-defined and documented integration support, including through our Public API and support through Private APIs. The features and functions of the system are defined and configured based on established business rules which can be easily modified to meet State-specific needs.<br><br>Business rules can be modified by authorized users using the Rules Editor function. All business rules are built to be easily modified and not embedded within RyL's core programming. This enables changes to be made at the UI tier, business tier,                                                                                                                                                                                                                                                           |
| Compliance          | CMP13          | Applies to all            | The Supplier shall be knowledgeable of and support the agency to maintain compliance with the "to be" vision of MITA 3.0 Standards and Conditions -Business Results Condition or the latest MITA version that requires states to align to and advance in MITA maturity for business, architecture and data in support of the business.                                                                                                                                                                                                                                                                                                                                             | Confirmed. RyL is built in alignment with MITA and the latest CMS OBC requirements for certification. Ongoing alignment and support will be provided throughout the project to ensure conformity to all business, architecture, and data requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Compliance          | CMP14          | Applies to all            | The Supplier must provide the agency with compliance assurances for the Supplier scope of work.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Confirmed. Upon award, HHS Tech Group will discuss final service level agreement (SLA) metrics which will be tied into the final contract to ensure adherence and assert our commitment to the success and compliance of RyL.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Compliance          | CMP15          | Applies to all            | The Supplier shall be fully compliant with the Health Insurance Portability and Accountability Act of 1996 (HIPAA, Public Law 104-1919) and Administrative Simplification (Subset of Title II) requirements in effect as of the date of release for the RFP and with any changes that subsequently occur, unless otherwise noted.                                                                                                                                                                                                                                                                                                                                                  | Confirmed. HHS Technology Group has policies and procedures regarding HIPAA and Administrative Simplification compliance, and this includes a commitment to protect the security of our clients' data. Failure to follow these policies and procedures may also result in disciplinary action up to and including discharge. Employees receive HIPAA and associated training upon hire and annually each year.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Compliance          | CMP16          | Applies to all            | The Supplier shall ensure all information not specifically identified as Protected Health Information (PHI) or Personally Identifiable Information (PII) as defined under HIPAA and/or HITECH is treated as privileged communications, held confidential, and must meet the terms and conditions specified in the RFP, BAA and Contract.                                                                                                                                                                                                                                                                                                                                           | Confirmed. HHS Technology Group's company handbook and policies address the confidentiality of client matters. HHS Technology Group requires that each employee maintain confidentiality when handling any data with known or suspected PHI/PII. All access to data is strictly controlled, monitored, and enforced on a need-to-know basis only for their particular role and job function. Any violation of our company policies will result in disciplinary action up to and including discharge.                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Compliance          | CMP17          | Applies to all            | The Supplier shall ensure that except as provided by law, no information in the possession of the Supplier about any individual shall be disclosed without prior written consent.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Confirmed. HIPAA and other associated laws are very specific on how and under what circumstances information about an individual can be disclosed. As such, HHS Tech Group has developed policies and procedures in place to ensure written consent is obtained before the release of any information. In working with the Agency, HHS Tech Group will maintain the same strict standards and conditions we have in place today for our other clients to ensure the secure protection of information, including any agency-specific information and at the individual level.                                                                                                                                                                                                                                                                                                                                                                       |
| Compliance          | CMP18          | Applies to all            | The Supplier shall follow all applicable technical standards for site and system security policies and procedures to protect the agency's healthcare data and information systems.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Confirmed. HHS Tech Group's comprehensive security plan aligns with all Federal standards and NIST 800-61 for Incident Response. This includes employing the six-step model of Preparation, Detection, Containment, Eradication, Recovery, and Post Incident review, with close coordination with the Agency to ensure compliance with any additional State-specific security policies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Compliance          | CMP19          | Applies to all            | The Supplier's data management approach and operational policies shall meet HIPAA, HITECH, ARRA and other federal and State privacy and security requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Confirmed. HHS Tech Group adheres to the data management and operational policies as outlined in HIPAA, HITECH, ARRA, and other established Federal and State privacy and security requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| Compliance          | CMP20          | Applies to all            | The Supplier shall retain, all original paper documents for a timeframe as specified by the Agency from the date the documents are received and have been scanned, indexed, stored and meet verification process standards. Original documents may be destroyed once indexed and stored and the retention period is met in accordance with State and Federal guidelines.                                                                  | Confirmed. HHS Tech Group will conform to all data and document retention policies. RyL's Content Module ensures all documentation is properly indexed and stored for retrieval. Any specific retention periods will be acknowledged and adhered to throughout the contract term.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Compliance          | CMP21          | Applies to all            | The Supplier shall maintain an auditing system and employ accounting/auditing procedures and practices that conform to GAAP and GAAS. All charges applicable to the contract shall be readily ascertainable from such records.                                                                                                                                                                                                            | Confirmed. HHS Tech Group's Finance Team conforms to all GAAP and GAAS principles and best practices. All charges, invoices, payments, and other transactions will be recorded, filed, and easily retrievable at all times.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Compliance          | CMP22          | Applies to all            | The Supplier will ensure that all technologies implemented are in compliance with any End User Licensing Agreements or other licensing arrangements.                                                                                                                                                                                                                                                                                      | Confirmed. HHS Tech Group maintains and ensures adherence to all licensing agreements in place for the proper operation of our solutions, including all backend components.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Compliance          | CMP23          | Applies to all            | The Supplier's solution shall ensure that all data necessary for legal requirements is retained.                                                                                                                                                                                                                                                                                                                                          | Confirmed. All data will be properly secured, stored, and retained. Data will be accessible to support any audit request or other legal needs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Compliance          | CMP24          | Applies to all            | The Supplier shall provide a mechanism to purge source documents in accordance with HIPAA security provisions and State requirements.                                                                                                                                                                                                                                                                                                     | Confirmed. RyL adheres and aligns with the Media Protection control family of the NIST 800-53 Rev. 4 which calls for the:<br>1. Employment of sanitization mechanisms consistent with guidance provided in NIST Special Publication 800-88 Revision 1, Guidelines for Media Sanitization.<br>2. Fine shredding of hard-copy documents using approved equipment, techniques, and procedures, and with a minimum of cross-cut shredding.<br>3. Securing of magnetic tapes/cartridges before, during, and after processing. Authorized employees must ensure that the proper acknowledgment form is signed and returned. Inventory records must be maintained for purposes of control and accountability. Tapes containing Personally Identified Information, any hard-copy printout of a tape, or any file resulting from the processing of such a tape will be recorded in a log that identifies:<br>a.Date received;<br>b.Reel/cartridge control number contents;<br>c.Number of records, if available;<br>d.Movement; and<br>e.If disposed of, the date and method of disposition. |
| Compliance          | CMP25          | Applies to all            | The Supplier's Information Technology Equipment and Software purchased and licensed with monies under this Contract for use by agency, employees, program participants, or members of the public must provide, as required by state code, blind or visually impaired persons with access, including interactive use of the equipment and services, that is equivalent to that provided to persons who are not blind or visually impaired. | Confirmed. HHS Tech Group ensures compliance with all Federal and State laws, statutes, codes, and mandates, including the provision of interactive use of equipment and services to accommodate persons who are blind or visually impaired.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Compliance          | CMP26          | Applies to all            | The Supplier's solution shall be compatible with multiple standard browsers in accordance to the State's IT Standards. The solution shall be compatible with standard browsers (as determined by the Agency) without requiring specialized or proprietary plug-ins.                                                                                                                                                                       | Confirmed. RyL is a completely browser-based system, and all modern browsers are supported. There are no plug-ins required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Compliance          | CMP27          | Applies to all            | The Supplier shall provide licenses as required by the Agency to allow users access to perform all necessary business functions.                                                                                                                                                                                                                                                                                                          | Confirmed. HHS Tech Group will maintain all licenses and provide role-based access to RyL to all approved, authorized users.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Compliance          | CMP28          | Applies to all            | The Supplier must refer any possible provider or member fraud, waste and abuse matters and supporting documentation from any source to the state agency's program integrity unit.                                                                                                                                                                                                                                                         | Confirmed. As a standard part of HHS Tech Group protocols, we will ensure prompt notification of any and all perceived, suspected, and/or detected fraud, waste, or abuse to the Agency's program integrity unit, as well as provide supporting documentation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Compliance          | CMP29          | Applies to all            | The Supplier must support the agency's benefit recovery functions by billing health carriers as defined in the Deficit Reduction Act of 2005 (DRA) via electronic, paper, or other means necessary in order to recoup monies.<br><a href="https://www.cms.gov/Regulations-and-Guidance/Legislation/DeficitReductionAct/index.html">https://www.cms.gov/Regulations-and-Guidance/Legislation/DeficitReductionAct/index.html</a>            | Confirmed. RyL is a robust solution, focused on increased cost avoidance and active recovery of third-party funds. HHS Tech Group will work with the Agency to support and enhance benefit recovery to recoup monies in alignment with all approved legislation and in conformity with all Federal and State requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Compliance          | CMP30          | Applies to all            | The Supplier's solution shall maintain Offshore Data Use policies as defined by the agency. The Supplier shall ensure that agency data is not used, maintained, transmitted, stored, or processed in geographic or virtual areas which are not subject to U.S. Law.                                                                                                                                                                       | Confirmed. HHS Tech Group does not use, maintain, transmit, store, or process any Agency data offshore.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |