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From: The Alliance to Transform CalFresh, the National Health Law Program, and Western Center on Law and Poverty

Re: System Migration Risk Mitigation Suggestions

The attached memo is a summary of the risks, identified by advocates, related to the migration to the CalSAWS system, along with proposals for mitigation of those risks.

We understand that migration risks have likely been identified in the planning process, and may already have mitigation options being developed.

Along with these suggestions, we request to learn more about existing understanding of risks and mitigation plans, and to provide information that may help in improving the mitigation plans along the way.

We look forward to your feedback on this memo and learning more about the process at our January SAWS Stakeholder meeting.

Overview

The State and Counties have had substantial experience with migration to large systems. All of these migrations had similar issues; large systems have many problems at launch requiring workarounds at the worst time – when staff and customers are coping with something new.

With CalWIN, the data conversion rate was 20% causing thousands of cases to be reviewed and corrected manually. With C-IV data migration issues caused backlogs creating an extra workload for staff that resulted in over-issuances compounding the problems. With LRS insufficient training and support for staff have resulted in similar issues compounded by the loss of functionality that was in LEADER, but not in LRS.

These issues are well known and we want to ensure the lessons have not been learned in a meaningful way. We feel it is clear that doing things right is less expensive the fixing thing that are wrong. Apart from the financial cost there is also the impact on staff who are not supported and customers who are ultimately the victims. We suggest these lessons be taken to heart with mitigation planned from the very beginning – with the gap analysis, the RFP, and a robust training and staff support plan.

The standard project management triple constraints are Time, Resources (people and costs), and Quality. The time constraint has been emphasized by the State and by USDA so we assume it is fixed.

We suggest that Quality also be fixed using standards that, in priority order:

1. Minimize impact to clients
2. Minimize impact to workers
3. Minimize impact to costs (Resources)

In past migrations the analogy has been ‘the train has left the station’ and the timeline cannot be changed. We suggest a better analogy of a series of trucks, one heading to each county on a road with guardrails, the ability to slow down if the curves are too tight, and the ability to supply extra help to counties in unloading and using their shipment.

General Mitigation Suggestions

1. Gap Analysis: All gaps should have a priority determined by impact from unacceptable to minimal.
 - a. The impact level should be determined by mutual agreement of the vendor and the impacted party. If the impact is one of policy the party would be the State; e.g. DSS and OSI. If the impact is one of additional work for staff the party would be county representatives. If the impact affects clients then the parties would be county representatives and advocates.
 - b. If it is decided that a gap will not be met in the new system; e.g. the gap affects an ancillary system that only affects a limited number of counties and

is deemed out of scope for CalSAWS then this should be determined and communicated quickly so the affected counties have time to develop their own mitigation.

2. RFP: Include clear risk mitigation standards. Some possible examples:
 - a. Since time is fixed the mitigation should focus on quality and resources. The vendor should provide trainers. A common sense plan could also include augmentation by experienced volunteer workers funded by the migration budget from the early migrated counties assisting counties that are later in the schedule.
 - b. Based upon the LEADER to LRS project these standards could be:
 - i. Provide X trainers plus Y experienced voluntary county staff per Z workers in each county. If Y volunteers are not available then vendor must provide the difference. To illustrate, 3 trainers plus 15 volunteers for every 100 workers.
 - ii. Ensure trainers and volunteers are available during the roll-out. The actual figures for X, Y, and Z should be informed by past experience with previous comparative roll outs.
 - iii. Pre-implementation training should provide full training environments where workers can work hands-on at their own pace. We understand this type of training is more expensive than videos however there is a great payback in a smoother implementation. This means that most defects should be corrected well before implementation.
 - iv. Provide sufficient funds to cover county costs for volunteers.
 - c. There are two pieces to problems that come to light in migration. The first is a defect in the design, coding, or data transfer that cause the problem. This properly should be corrected by the vendor development team. The second piece is the interim workaround. We suggest a dedicated 'tiger team' that is separate from the development team, to develop workarounds. The policy for correcting these problems should be 'automation first' with manual workarounds a last resort. Below are some suggestions for the RFP.
 - i. The tiger team should consist of a manager, X analysts, and Y developers to rapidly develop corrections to data conversion problems. While this team should have some understanding of the base system, their skill set should be based on corrective SQL queries and other scripting languages.
 - ii. 'Automation first' means that manual workaround instructions for county staff should be the last resort.
 - iii. The solutions developed by this team should ideally be used once, or worst case once for each county.

- d. X% of the project budget is allocated to system migration issue resolution. Use of this budget shall be determined by (OSI and CWDA) and if unused will revert to the vendor.

Risk Matrix

For the LEADER to LRS project Accenture measured Impact from 1 (Minimal) to 5 (Unacceptable). This was cross matrixed by the Probability of the Risk ranging from 90% (Near Certainty) to 10% (Highly Unlikely). We suggest that the RFP provide an unambiguous definition of these impacts. Some possible examples follow – note that the placeholders of X, Y, and Z should be informed by recent experience and also that we assume that X1, Y1, and Z1 are higher than X2, Y2, and Z2, etc.

Unacceptable (Level 5):

1. Does not comply with legislation – either existing or new legislation introduced during the system development period.
2. Incorrectly denies or reduces or terminates benefits for any customers
3. Incorrectly computes benefits for X1% of customers
4. Incorrectly converts data requiring a manual intervention by Y1% of counties or Z1% of cases
5. Incorrectly awards benefits for X1% of customers
6. Other impacts to be determined.

Moderate Impact (level 3):

1. Incorrectly computes benefits for X2% of customers
2. Incorrectly converts data requiring a manual intervention by Y2% of counties or Z2% of cases
3. Requires a workaround that cancels and then recreates the case
4. Other impacts to be determined.

Minimal Impact (level 1):

1. Incorrectly computes benefits for X3% of customers
2. Incorrectly converts data requiring a manual intervention by Y3% of counties or Z3% of cases
3. Other impacts to be determined.

Roll Out Schedule and Impact Matrix

Although the completion date is fixed the roll out schedule has not been determined. A major problem with CalWIN were extremely low data conversion rates requiring manual work arounds which compounded as the schedule moved on without relief. We suggest the RFP address this issue.

1. The schedule will provide adequate time between the first counties to migrate and the later counties to address migration issues including inadequate training.
 - a. The roll out schedule will be flexible so that more time can be given to mitigation for early counties than later ones. We acknowledge that Counties

need a lot of lead time and it may not be possible for them to accept a migration date of X plus or minus 30 or 45 days.

- b. The vendor will allow counties of similar size to have the ability to switch migration dates with, for example, 60 days prior notice.
2. In the event a county has not achieved the following standards the roll out schedule shall be stopped.
 - a. All unacceptable Risks (Level 5) have been mitigated
 - b. No more than X% Level 4 Risks remain
 - c. No more than Y% Level 3 Risks remain
 - d. No more than Z% of cases are in error after migration
3. In the event the migration deadline cannot be met and the counties lose Federal or State funding then the vendor shall reimburse the counties for these amounts.