

January 6, 2023

System Readiness Artifacts: A Refresher on Medicaid Enterprise Systems Artifacts for Unwinding

Most states made changes to their eligibility and enrollment (E&E) systems in response to the COVID-19 Public Health Emergency (PHE) and the continuous enrollment condition of the Families First Coronavirus Response Act (FFCRA). Though the type and degree of system changes vary by state, almost all states will need to make changes to their Medicaid Enterprise Systems (MES) in order to resume full renewal processes when redeterminations are to take place. These changes may include functionality related to terminating eligibility and coverage of ineligible individuals, re-starting electronic verifications, or making updates to notices. Given that states have also continued work on new or ongoing Medicaid Enterprise System (MES) projects, states will need to identify all necessary changes and test their renewal processes to ensure system readiness prior to returning to normal operations.

Before the initiation of renewals as a result of the continuous enrollment condition expiration, states will be required to submit certain routine documents to CMS to demonstrate system readiness. The chart below highlights how unwinding should be reflected in the testing artifacts states develop and maintain as part of their ongoing systems projects.

System Readiness Artifacts ¹	
Configuration Plan 	<ul style="list-style-type: none"> • States may also refer to this document as an Implementation Plan. • The Configuration plan identifies how the state will test the changes made to the system to return to resume normal operations and resume a full renewal process. The state should also include changes related to any PHE-related flexibilities the state intends to end or extend when returning to normal operations.
Test Plan 	<ul style="list-style-type: none"> • The test plan documents how the state will implement testing of each component/module of the system to ensure that the state will be able to return to normal operations • The test plan should include at a minimum the testing stakeholders, names the types of testing (End to end, UAT, etc.), entry and exit criteria, test data requirements, describes the testing environment, testing schedule, and defect management process including tracking, analyzing and resolution. • Limitations, risks, and related mitigations are typically identified in the plan.
Test Results 	<ul style="list-style-type: none"> • Test results document the results of what is executed in the test plan. The results provided should clearly connect to and flow from the test plan framework and at a minimum, test results should be mapped to a requirement and the impact to eligibility functionality should be clear. • State should also provide an acceptance testing report for each user story/use case with summary metrics indicating a percent pass and percent fail rate. • Found defects should be named and align with the schedule for resolution in the testing plan. Limitations and risks should be specifically named.

¹ System Readiness Artifacts must align with CMS guidance on Streamlined Modular Certification, as outlined in the State Medicaid Directors Letter and Guidance from April 2022. The full suite of guidance is located at <https://www.medicare.gov/medicaid/data-systems/certification/streamlined-modular-certification/index.html>

Submission of Artifacts

As a reminder, testing artifacts must be submitted to CMS no later than February 1, 2023, for states that intend to begin renewals in February, or February 15th, 2023, for all other states.² Systems Readiness artifacts and any Unwinding-related questions on this topic should be submitted to CMSUnwindingSupport@cms.hhs.gov.

CMS understands that each state has its own internal process to identify, document, and test system changes and processes. Therefore, and to reduce the administrative burden on states, CMS will not publish a template for states to use, but does expect that the state- or vendor-developed artifacts will align with our [MES Testing Guidance](#).

States can visit the Certification Repository on GitHub to access examples of test plans and other systems artifacts, including information about the regulatory conditions for enhanced funding, outcomes, metrics, and related supporting evidence/examples to help inform how states approach their IT investment planning, development, operations, and certification. Users will need to register to access the site, located at <https://cmsgov.github.io/CMCS-DSG-DSS-Certification/>.

² <https://www.medicare.gov/federal-policy-guidance/downloads/cib010523.pdf>

State System Readiness Artifacts Frequently Asked Questions

Q1: When should testing artifacts be submitted?

A1: System Readiness artifacts (system configuration plan, system testing plan and test results) are due no later than February 1, 2023, for states that intend to begin renewals in February, or February 15th, 2023, for all other states³. However, a state may submit their test artifacts earlier, and CMS encourages states to do so.

Q2: How should a state submit its testing artifacts?

A2: States should email System Readiness artifacts to CMSUnwindingSupport@cms.hhs.gov with the subject line: [NAME OF STATE]: Testing and Configuration Plans. States are also encouraged to cc: their Medicaid Enterprise Systems (MES) State Officer.

Q3: What is the process after the state submits the testing artifacts?

A3: CMS will conduct a review of the testing artifacts to assess system readiness. CMS will provide acknowledgement of receipt and will respond to states with any questions, or to request additional information as needed to help validate our understanding of state systems readiness.

Q4: Can the state submit a report prepared by an IT vendor?

A4: Yes, but the state is responsible for ensuring the reports meet artifact expectations. All artifacts should be able to be read by an audience outside the state's technical team; for example, the state should include an acronym list or other notes to support CMS review.

Q5: Will CMS provide states with a template for testing and configuration plans?

A5: No. CMS understands that each state has its own internal process to identify, document, and test system changes and processes. Therefore, and to reduce the administrative burden on states, CMS will not publish a template states to use, but do expect that the state- or vendor-developed artifacts will align with our [MES Testing Guidance](#).

Q7: Are there particular types of testing that CMS is looking to see in the testing plan?

A7: States should employ a range of test types that best test the functionality in question. For example, load testing for batch processes including redeterminations or Account Transfers, end-to-end testing to ensure system readiness, and user testing where the system has a user touch or non-system process component. For additional support in considering approaches to unwinding testing please refer to [Resources to Support System and Logic Testing for Unwinding](#).

Q8: What if my state did not make system changes as a result of the PHE and does not have changes to test for unwinding?

A8: There are rare instances where states only made manual processing adjustments rather than system adjustments and therefore may not be planning to test their systems to prepare for Medicaid unwinding. A state in this unique situation may submit an email explaining the limited scope or lack of testing. For any questions, please send an email to CMSUnwindingSupport@cms.hhs.gov.

³ <https://www.medicaid.gov/federal-policy-guidance/downloads/cib010523.pdf>

Q9: To whom can a state reach out to with any questions about their testing plan or their testing artifacts?

A9: Please contact the CMS Unwinding mailbox at CMSUnwindingSupport@cms.hhs.gov with questions.

Q10: Where can a state find samples of the system readiness artifacts?

A10: States can visit the Certification Repository on GitHub to access examples of test plans and other systems information including information about the regulatory conditions for enhanced funding, outcomes, metrics, and related supporting evidence/examples to help inform how states approach their IT investment planning, development, operations, and certification. Please access the CMS Certification Repository on GitHub at <https://cmsgov.github.io/CMCS-DSG-DSS-Certification/>

Q11: Are additional testing resources available for states?

A11: The guide, [Resources to Support System and Logic Testing for Unwinding](#) is available to provide states with an in-depth review of technical approaches and promising practices for testing during unwinding.