RFP 22-70302 All Payer Claim Database
Attachments E & F Clarification Questions

Response Due by June 9th at 2:00 PM Eastern

1. What is the total headcount of your company? Can you please provide a detailed breakdown of diversity within your organization's staff?

The total headcount of employees at Onpoint Health Data is 50 as of June 9, 2022. Onpoint continues to highly value inclusion and diversity among our team members, maintains a nondiscrimination policy and diversity training program, and is a committed equal opportunity employer. The table below provides details regarding the current diversity within our organization's staff.

Age (in Years)	Staff Count	% of Total Staff
Under 40	29	58%
40+	21	42%

Gender	Staff Count	% of Total Staff
Female	22	44%
Male	27	54%
Not specified	1	2%

Race	Staff Count	% of Total Staff
White	46	92%
Black or African American	1	2%
American Indian or Alaskan Native	0	0%
Asian	3	6%
Native Hawaiian or other Pacific Islander	0	0%

2. Please provide a formal, detailed copy (as a separate attachment) of your Disaster Recovery plan.

A full copy of Onpoint's Disaster Recovery Plan has been included as a separate attachment ("Onpoint - IN RFP 22-70302 - Clarification Exhibit 2.A - Disaster Recovery Plan (Confidential).pdf").

Please note that Onpoint's Disaster Recovery Plan is confidential and should not be made available publicly (e.g., through FOIA requests) as it contains sensitive information regarding Onpoint's security measures and policies, which would be jeopardized by release.

3. In your response, you detail that Onpoint CDM is a multi-tenant, SaaS solution, but this is not detailed for your data warehouses. Does this apply to your data warehouses as well? If not, are the warehouses able to exist in the State's AWS tenant?

Unlike Onpoint CDM, Onpoint's data warehouse solution, the Analytic Environment, is not multi-tenant. Each of Onpoint's clients has their own Virtual Private Cloud (VPC) as well as individualized infrastructure within the VPC, which is included in our proposed solution for IDOI.

Onpoint can deliver the same data structures available within our Analytic Environment to an environment within the state's AWS tenant if preferred. In this scenario, the data would be delivered in text or Parquet formats and would be easily uploadable by the State into a database of the State's choosing within that environment. Onpoint would not manage the infrastructure within the State's environment; instead, State staff would support and manage the infrastructure and user access.

4. Will your solution be able to tie back into the State's Azure AD authentication and multifactor?

No, our solution would not tie back to the State's Azure AD authentication and multifactor system. As part of Onpoint's Software-as-a-Service (SaaS) model, we handle user management and permissions and manage the multifactor authentication (MFA) infrastructure across our client base. For security reasons, we have found that Onpoint's management of user credentials for accessing Onpoint's systems offers the greatest benefits. If integration with the State's Azure AD system is highly preferred, Onpoint's IT team would be happy to discuss the related details and implications further with the State.

5. Can you please provide a justification as to why the integration between the consumer website and Access Indiana is necessary?

To clarify, integration between the consumer website and Access Indiana is **not** necessary or anticipated as part of our proposed solution. The consumer website and its summarized reporting and visualizations can function entirely independently of Access Indiana while providing robust data to the general public.

However, if IDOI has use cases that would gain value from linking information from the consumer website to Access Indiana users, Onpoint can support such efforts through additional integration services. Use cases could include instances when storing information about the user may improve their website experience (e.g., retaining the user's address to guide them to geographically targeted information or retaining prior session information to allow users to recreate or save their selected report filters).

6. Please provide complete Corrective Action Plans or substantive information regarding the Corrective Action Plans referenced in your HITRUST Certification Letter. It is the State's strong preference that you provide the complete Corrective Action Plans.

Onpoint has provided a copy of our HITRUST Corrective Action Plan and status update as a separate attachment ("Onpoint - IN RFP 22-70302 - Clarification Exhibit 6.A - HITRUST MyCSF Corrective Action Plan (Confidential) (2022-06-03).pdf"). This document includes notes regarding ongoing steps taken to address any identified issues. We are happy to discuss this document or any aspect of our information security program in more detail with the State.

Please note that Onpoint's HITRUST Corrective Action Plan is confidential and should not be made available publicly (e.g., through FOIA requests) as it contains sensitive information regarding Onpoint's security measures and policies, which would be jeopardized by release.

7. In Section 5.22 of your Technical Proposal response, you reference an external cybersecurity firm that monitors all access to your environments. Please disclose the partner firm and any associated subcontractors involved in monitoring access to your environments and their corresponding level of access to your environments and PHI/PII data.

Please note that Onpoint's response to this question, which identifies Onpoint's external cybersecurity firm, is confidential and should not be made available publicly (e.g., through FOIA requests) as it contains sensitive information regarding Onpoint's security measures, which would be jeopardized by release. In case helpful, Onpoint also has supplied a redacted version of this clarifications document for FOIA purposes.

8. Please explain your rationale for keeping all data in production.

For our APCD clients, Onpoint delivers a refreshed data extract each quarter, which includes all years of data. We also retain the preceding data extract to enable research continuity for projects not yet completed. Older extracts are archived for cost efficiency but can be restored to the database upon request.

All years of production data are included in the extracts based on our experience with clients and their end users, who have shown a strong desire to work with as much data as possible for their analyses. Storage prices have decreased rapidly in recent years, and we have found that the cost of storing the entirety of this data is negligible and is more than offset by the benefit of allowing users to work with the most complete data set possible. If the State's users have no need for this data and would prefer that the number of years be limited, Onpoint can limit the available data to a set number of years (e.g., 3 years, 5 years, 10 years).

9. If the State elects to use Onpoint's SharePoint based on Collaboration Zone, will this be provided at no cost to the State? Please answer this question in a fashion that does not disclose specific cost ($) information.

Yes, Onpoint's SharePoint-based Collaboration Zone would be provided at no cost to the State.

10. How will your company prepare the State team to operate in an Agile environment when many of the participants may not have participated in a project of this size or scope before?

Onpoint's Agile approach encompasses the software development life cycle of the underlying systems that have been configured to meet the State's needs. This does not include the project management activities led by our dedicated Project Manager in support of State.

Onpoint's development team follows a two-week sprint cycle – a period in which a set amount of work is planned to be delivered. Onpoint's Product Manager identifies which items in the development team's backlog are of the highest priority for a given sprint based on feedback from our clients and other stakeholders. These high-priority tasks are assigned to developers and testers, who design, develop, and test the new functionality within environments separate from the production environment accessed by our clients and their data submitters and end users. At the end of each sprint, all completed and successfully tested development work is released to production. The cycle is repeated every two weeks and is guided by a forward-looking product roadmap.

The State's team members do not need to be familiar with or trained in Agile development and will not be directly impacted by Onpoint's use of the Agile approach but will experience its benefits. Agile is a system designed to iteratively incorporate user requirements on a frequent and consistent basis. The State will see benefits from this approach both during and after implementation as Onpoint's team leverages this methodology to incorporate requirements quickly and iteratively to provide rapid system updates. Onpoint has used this approach to support each of our APCD clients for both implementation and ongoing operations with great success.

11. Please provide a rationale for the estimated total number of project hours provided in each category of your Resource Usage Template. Please also explain how many hours went into similar projects for other states.

The estimate provided to IDOI for the total project hours is based on Onpoint's experience successfully implementing and operating similar APCD projects for other states, including 6 implementations in the past 7 years. The estimates provided in the Resource Usage Template ("Onpoint - IN RFP 22-70302 - Att. J1 - Resource Usage Template (2022-04-04).xlsx") cover the expected hours for a total of 48 months of services and include both the implementation and maintenance and operations (M&O) periods. The rationale used to identify the breakout of hours into the categories provided in the Resource Usage Template are detailed in the following table.

Category	Rationale & Tasks Included
Project Management	Criteria used to estimate the project management hours include the following: • Level of experience required for the project team • Number of stakeholders participating in the requirements and user acceptance testing (UAT) process • New development required to implement IDOI custom functionality (e.g., consumer-facing website) • Number of subcontractors included to meet state RFP requirements (e.g., MBE, WBE, VBE) • Number of project artifacts and documents required

	• Frequency of touchpoints with all stakeholders
Requirements & Process Mapping	A key component of a successful APCD implementation, this component includes a multi-functional team to develop technical requirements for development. Criteria used to estimate the relevant hours include the following: • Number of data sources to be collected • Number of layouts for file submission • Number of data products for distribution • Types of public reporting to be generated
Design	Design work is focused on the website development. Criteria used to estimate the relevant hours include the following: • Development of user stories by key stakeholders guiding the presentation of public reporting • Creation of wireframes through an iterative process • Alignment of website with IDOI standards for website development
Application Configuration	Application configuration is a multi-functional team process focused on configuring Onpoint CDM to achieve the data collection, access goals, and reporting goals set by the Indiana APCD RFP. Criteria used to estimate the relevant hours include the following: • Number of data types to be collected (e.g., eligibility, medical, pharmacy, provider) • Number of Indiana-specific elements to be configured (e.g., eligibility flag for Hoosier Healthwise members) • Number of data submitters and volume of data to be collected • Types of tools that IDOI requests for access to the data (e.g., SQL, Tableau) • Number of data users who will access the data • Expected implementation duration (e.g., 9 months) • Generation and configuration of Indiana-specific rules for validation, clustering, consolidation, and value-adds
Application Development	Onpoint's solution includes Onpoint CDM, a proven application developed specifically for APCD data management and analytics. Criteria used to estimate the relevant hours include the following: • Updates to Onpoint CDM to enable Indiana-specific security requirements • Complexity and volume of Indiana-specific functionality required to be implemented
Testing	Criteria used to estimate the relevant hours for the testing process include the following: • Number of components that will require testing • Number of Indiana-specific data elements that will need synthetic test data generated • Agile approach to development and testing process

Training	Training is both an initial and ongoing component of the proposed solution. Criteria used to estimate the relevant hours include the following: • Onpoint's proven training program for data submitters, clients, and end users, including webinars, office hours, and collaborative, ad hoc trainings
Data Conversion	Data conversion is a key component of the APCD process. Criteria used to estimate the relevant hours include the following: • Number of total submitters • Number of submitters that already have onboarded with Onpoint for other state APCDs • Volume of historical data to be collected • Frequency of ongoing submissions • Number of file types to be collected • Types of reporting and analytic value-adds required to meet the RFP specifications
Interfaces	Criteria used to estimate the relevant hours for the interface component include the following: • Number of vendors working together • Number of connections between interfacing systems • Configuration updates to Onpoint CDM to enable Indiana-specific requirements
Organizational Change Management & Communications (OCM & Comms)	While the implementation of OCM and Comms are part of our core services and span many of these components, the hours estimates for this column were based on the following criteria: • Number of kick-off meetings with IDOI staff and stakeholders to develop and approve the Organizational Change Management (OCM) Plan • Number of expected iterations to draft and approve the OCM Plan • Frequency of updating risk and issue logs • User account management in Jira for tracking change requests
Go-Live Preparation & Execution	Go-live preparation and execution include the transition from implementation to M&O. Criteria used to estimate the relevant hours include the following: • Finalization of all documentation (e.g., business rules, training, data submission guides) • Number of years of historical data collection • Communication and outreach activities
Production Stabilization	Onpoint's solution includes a mature and proven APCD platform that is used widely across the marketplace. Criteria used to estimate the relevant hours include the following: • Iterative UAT with IDOI to configure Onpoint's standard solution to support the Indiana APCD

	• Number of UAT periods with IDOI to approve the system launch of Onpoint CDM's registration and data processing modules to accommodate the Indiana RFP
Other Project Services	Other project services include functions that are shared across clients and are required for a successful APCD implementations. Criteria used to estimate the relevant hours include the following: • Implementation of Indiana-specific privacy and/or security requirements • Number of meetings for engagement of stakeholders to establish a secure and sustainable APCD

12. Please provide additional detail in regard to which third party licenses (e.g., JIRA, CDM) will be transitioned in the event that the State elected to change administrators.

Onpoint has been part of successful transitions in both directions – handing off to an alternate vendor and (more often) taking over services from another vendor. Across all transitions, the most important factor in the process is the complete transfer of the State's data, including raw submissions, generated data sets, and reporting. Most of the third-party tools and software that are used by the data vendor to deliver services would not be transferred given licensing restrictions and the new data vendor's likely preference to utilize their own tools (e.g., an alternate product for ticketing, support and issue tracking instead of Jira). Onpoint CDM is a platform developed by Onpoint over nearly 20 years to reliably deliver APCD services; another vendor would bring their own systems and tools. The one type of third-party tool that we typically see transferred between vendors is grouper software when the State directly licenses the tool. In such cases, the State typically lets the data vendor use that license for the duration of the contract but then transfers that software when a new vendor is selected. Any tools that the State directly licenses would be transitioned in the event that the State elected to change data vendors.

13. Please provide an example of how you have transitioned your solution, including which third party tools were transitioned, from a previous client. Please provide a checklist of considerations you utilized in your approach. What were the major concerns and challenges encountered? What was the outcome for the client?

Example of Transitioning Our Solution, including Third-Party Tools

We pride ourselves in successfully retaining clients over many years and through multiple re-procurements but also understand that no vendor retains all relationships indefinitely. When the time has come to transition a client's services from Onpoint to another vendor, we have consistently handled the process in a smooth and professional manner to ensure the program's ongoing success. Details regarding transitioning specific tools include the following:

- **Onpoint CDM.** As Onpoint CDM, which was built and is owned by Onpoint, is delivered in a SaaS model, the license for our data management platform is not transferrable. The client's new data vendor would receive all raw and processed submissions and migrate those to their own data integration platform.

- **Analytic tools and grouper licenses.** As noted in our response to the preceding question, if the State directly licenses analytic tools, such as grouper software, then the licenses for these tools can be transferred to another vendor. In a recent transition, Onpoint was involved in the transfer of third-party tools that the State had licensed directly, including groupers (e.g., 3M and Johns Hopkins groupers) and analytic software (e.g., Medi-Span, SAS).
- **Measures.** Onpoint can work with a new vendor and the National Committee for Quality Assurance (NCQA) to transfer the covered lives fee paid to NCQA to certify and utilize NCQA measures. The new vendor would be required to own the process for calculating measures in their own system, but the State would not be responsible for paying NCQA's annual fee twice.
- **Tableau and BI dashboards.** Onpoint's licenses for analytic tools such as Tableau, which supports our BI dashboards, cannot be transferred to another vendor, but if a vendor should procure their own license, Onpoint would be able to transfer existing workbooks and dashboards that could then be loaded into the new vendor's system.
- **Jira and SharePoint.** Onpoint can transfer the materials that have been saved to project management sites such as Jira and SharePoint to ensure that historic knowledge is shared but cannot transfer our existing environments to another vendor.
- **Data warehouse.** In the case of a transition from Onpoint's data warehouse to the State's or another vendor's environment for hosting of the data warehouse, Onpoint will work with IDOI to establish a secure connection between Onpoint's system and the new environment – either through cloud vendor application programming interfaces (APIs) or through secure file transfer protocol (SFTP).

Checklist of Transition Considerations

Previous transition steps have included the transfer of submitter metadata and contact lists, file layouts, historical data in both raw and processed formats, historical data quality reporting, and a comprehensive data dictionary that details the data model and field relationships. Other standard considerations and steps in our approach include the following:

- Continued operations assistance to the client in maintaining timely collection of data upon expiration of the contract for an agreed-upon time as needed
- Provision of a list of all registered contacts and organizations participating in the APCD
- Delivery of final, consolidated extract files with associated documentation, including the most current data dictionary and release notes profiling the most current database's content and limitations
- Complete and timely transfer of the pre-consolidated APCD data files submitted to Onpoint
- Availability of key Onpoint staff by phone and email to consult with the client and new vendor staff

- Ensuring the documented destruction of all data provided by submitters and the client to Onpoint related to the APCD contract in accordance with the client's policies and timelines

During a transition, Onpoint's staff work collaboratively with both our client's staff and the new vendor's staff to assist with all data and documentation transfer steps. The following table includes a sample checklist from a previous client transition.

#	Transition Activity	Owner
1	Introduce the data submitters' technical support teams to the new vendor team	Onpoint / New Vendor
2	Provide an inventory of all current data submitters, including product names, NAIC numbers, contact information, and types of files being submitted	Onpoint
3	Transfer all historical client APCD data, including both the raw data as received from the data submitters as well as the processed data extracts not already transmitted to the designated data center / environment	Onpoint
4	Transfer all Medicare files received from CMS (if applicable)	Onpoint
5	Provide a data dictionary that includes a description of each element in the processed data extract sent to the designated data center / environment	Onpoint
6	Transfer all technical specifications and templates for data submissions as reflected in the client's APCD data submission guide	Onpoint
7	Provide copies of quarterly extract data quality reports not already transmitted to the client	Onpoint
8	Provide all approved variances submitted by data submitters	Onpoint
9	Provide updated documentation regarding the most recent submitter issues and quality assurance (QA) documentation as reflected in the latest QA report	Onpoint
10	Provide the client with electronic versions of any analyses, reporting, and technical documentation developed exclusively for the project and not previously delivered	Onpoint
11	Terminate access to the client APCD data via Onpoint CDM	Onpoint
12	Destroy all client APCD data in Onpoint's possession, providing attestation to the client when complete	Onpoint

Major Concerns & Challenges

During previous client transitions, Onpoint recognized that there would be technical risks associated with migrating systems, including the following:

- **Concern #1**: Generation of the same or similar reporting after a vendor change, but achieving significantly different results, which could impede stakeholder trust and support

- **Concern #2:** Disruption of submission processes due to the exchange of data with a new vendor, which would delay ongoing data transfers and submissions to the APCD and cause interruption of data delivery to end users
- **Concern #3**: Delays in contracting with the new vendor, which would leave insufficient time to transfer knowledge through training, documentation, and meetings

Client Outcome

Onpoint's experience in migrating APCDs has allowed us to anticipate and plan for potential risks and effective mitigation strategies associated with a transition. By working collaboratively with the client to ensure cooperation and compliance with all parties involved in the transition, Onpoint was able to successfully transition responsibilities to the client's new vendor. We relied on our skilled project management team to transfer client knowledge (e.g., key contacts, policies or procedures, specifications, and data content) and our data operations team to successfully support the transfer of historical data and metadata to the new vendor (e.g., submitter registrations, approved variances, submission status logs). We received sign-off and acceptance by our client on all vendor transition duties.

14. As many states are starting to adopt data privacy regulations introducing consumer control of their personal data, does your solution allow for the deletion of an individual's personal records upon a direct request from that individual? Have you encountered that issue in any other states?

Yes, Onpoint has encountered requests by our clients for data deletion at multiple levels (e.g., individual, cohort/group, client, submission). Our systems have been designed to accommodate these types of record removal requests. The most typical request for deletion, which has been used most recently by our clients participating in CMS's Comprehensive Primary Care Plus (CPC+) program is the required exclusion of an individual's records based on a request sent to an opt-out portal. In such cases, the individual's request is passed to Onpoint CDM, which associates the provided information with the member's APCD records and then excludes all of their data from downstream processing and data delivery. This functionality has been included in our current base price and proposal submitted to IDOI, with the assumption that another entity (e.g., IDOI) hosts and handles the opt-out portal or aggregation of records to be excluded.

Another example of a data removal request that Onpoint has accommodated is the deletion of submitted data from all locations in the underlying database along with certification of the data destruction (e.g., database, incoming submissions, data back-ups). This scenario occurs infrequently based on our experience and is typically caused by a health plan identifying a cohort of members that were submitted in error (e.g., a self-insured plan requesting to opt-out of APCD submission). In such cases, Onpoint has successfully deleted the requested data from all locations while maintaining the integrity of the surrounding records. This would be considered an ad hoc request and would be priced based on the volume of data for removal, the number of locations that require record/file deletion, and the level of shredding and advanced forensics required by the health plan and/or client to certify the destruction.