

5.5 Dedication to Quality

RFP Section 4.4.5, page 23; Appendix B References #23, 35, 50, 75 - 85, 94, 131 - 136, 208 - 221, and 267 - 288

MAXIMUS is a quality-focused company. We support a "quality first" approach by applying industry standard best practices that foster greater accountability, more efficient processes, a disciplined use of proven methodologies, and continuous performance improvement across all of our projects. Our quality approach is built on a foundation of management responsibility for monitoring performance against project goals and contractual requirements. Key metrics of quality and timeliness are defined at project inception, and then operational data is captured, reviewed, and evaluated to assess compliance and to identify needs for business process improvement. Our business processes are analyzed on an ongoing basis for consistency, reliability, and efficiency. We identify best practices through quality management and integrate them across the company.

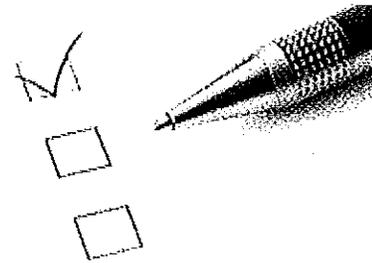
Our standardized and repeatable quality management processes minimize risk for the Exchange and foster continuous performance improvement. With the lives of tens of thousands of families and children in Connecticut directly affected by how well we perform on this contract, MAXIMUS is determined to deliver high quality services to meet or exceed all of your performance expectations.

MAXIMUS offers a solid foundation for the Exchange. We have sufficient operational capacity to provide high quality services that meet required performance standards throughout the entire contract period as well as scalable systems and business processes to meet future program changes and expansions. We look forward to working with the Exchange as a collaborative partner to provide all of the services required by this RFP now and in the future, even as our health insurance exchange business grows through new contracts with other state government clients. The Connecticut Health Benefits Exchange Call Center is not dependent on, or constrained by, any other projects we operate. Our business model assures a fully dedicated, independent project team supported by corporate resources and the sharing of best practices across our numerous call centers.

5.5.1 Quality Management and Continuous Improvement

Appendix B Reference #35

Our proven quality management methodologies and dedication to continuous improvement helps ensure that the Exchange Call Center contract will operate in accordance with industry-accepted standards, provide full visibility and transparency in a collaborative partnership environment, and support the Exchange's commitment to business process improvement. We are prepared to participate in ad hoc continuous improvement programs initiated by the Exchange and collaborate with the Quality Assurance vendor in implementing these initiatives.



Our approach to quality management is based on a fundamental commitment to systematic and ongoing quality control, quality assurance, and business process improvement activities that are comprehensive and customer-focused.

- Enhance customer satisfaction
- Add value to project processes within the contracted scope
- Continuously improve project processes

[REDACTED]

5.5.1.2 Approach to Providing Continuous Improvement

Appendix B References #94 and 286

Well-defined and repeatable business processes are the foundation of continuous improvement. On many of our large and complex call center projects, MAXIMUS applies rigorous Business Process Management (BPM) methodologies and tools to study and improve our business process workflow. Using BPM, we monitor our business processes rigorously to ensure that we meet service levels as well as detect and proactively react to changes in volumes or client behavior.

BPM is applicable to the Exchange Call Center in numerous ways, including:

- Temporary staffing adjustments in response to predictable periodic events like open enrollment
- Adjustments in the IVR navigation to improve efficiency and provide a faster path to the answers and information callers most frequently seek
- Refinement of the kinds of inquiries and topics that are most suitable for Tier 1 and Tier 2 handling
- Creation of specialized Call Center Representative (CCR) teams to handle recurring issues of unusual sensitivity or complexity

In combination with experienced judgment, our BPM methods and tools provide unique and deep visibility into call center performance, suggest new ways to improve consumer assistance, and reduce risks if we need to make business process adjustments.

We use modeling capabilities to validate business process solutions and enable "what if" questions to be answered without taking an untested risk with the real-life process. These modeling efforts are a cost-effective way to analyze alternatives and predict in advance whether a proposed change may have the desired effect or produce unexpected or unintended consequences. Additionally, these modeling efforts help us estimate the optimal staffing levels to attain desired performance levels.

Our BPM methods and tools, data analytics, and reporting capabilities help us maximize staff productivity, minimize breakdowns or bottlenecks, and improve our business processes in a systematic way that avoids risk-taking in real-time. They continuously identify process anomalies, track performance against defined metrics, and support quality improvement efforts. We have the capability to apply these BPM best practices to our operation of the Exchange Call Center.

5.5.2 Quality Assurance Plan

Appendix B References #284, 287 - 288

A well-conceived Quality Assurance Plan combines staff accountability standards, business process management methods, and analytical tools as a means for monitoring performance in relation to established corporate standards and contractual requirements. The Plan describes the approaches used to quantitatively define program requirements and goals, methods for selecting quality control samples, and procedures for analyzing data and generating required reports. The Plan also describes the tools we use to measure the extent to which we meet or exceed all performance standards and contractual requirements.

Our Quality Assurance Plan for the Exchange Call Center project is requirements-based, customer-focused, and performance-driven. It provides specific guiding principles that encourage the development and delivery of high-quality products and services to Exchange customers.

Our comprehensive Quality Assurance Plan, which we will deliver to the Exchange before the end of the implementation period, follows a four-step quality monitoring process, as shown in *Exhibit 5.5-2: Quality Monitoring Process*.



[REDACTED]

The functional components of our Quality Assurance Plan are described in the following subsections.

5.5.2.1 Quality Assurance Review Process

Our performance-driven QA review process entails implementing a cycle of planned, systematic evaluation tasks designed to assess the effectiveness of our operations and business processes. These tasks include analyzing Exchange Call Center trend data, identifying deficiencies promptly and developing appropriate corrective actions, and making suggestions for business process improvements.

[REDACTED]

Section 4.4: Staffing Plan.

These QA staff members are responsible for monitoring operations related to function-specific performance standards, reporting requirements, and estimated activity levels for the project. Specifically, they review and analyze operational data captured by our various automated systems to track all factors of

actual project operations against contractual performance metrics; identify performance issues and initiate corrective action in a timely manner; and assist the project in maintaining compliance with all contractual requirements. QA staff members strictly adhere to our comprehensive Quality Assurance Plan in keeping with our corporate commitment to quality.

[REDACTED]

[REDACTED]

[REDACTED]

5.5.2.2 Quality Control Review Process for Call Monitoring

Appendix B Reference #56

Monitoring customer interactions is a major component of the quality management program we employ in our call center projects. Call monitoring involves reviewing samples of CCR calls, scoring them, and comparing them to established goals on a routine basis. We monitor for accuracy, timeliness, program knowledge, and the ability to treat callers with dignity and respect. The goals of our monitoring approach are to help achieve high customer satisfaction and positive Exchange Call Center outcomes, which include resolving customer issues on the first call and reducing, when possible, the number of calls transferred to existing consumer assistance programs or the DSS Benefits Center.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

QA staff members monitor calls to assess CCR performance across a range of indicators such as the quality and accuracy of information given and obtained, the professional and courteous manner in which calls are handled, appropriate and complete entry of data in the CRM, and compliance with Exchange policies and procedures. QA staff members use an online monitoring form, developed in response to RFP-specific requirements, to grade sampled calls on how well CCRs are able to meet established quality criteria. Once the QC review process is completed, CCRs are provided with clear documentation of performance results and receive feedback in both written and verbal formats.

5.5.2.2.1 Call Sample Selection Process

Our call center projects routinely select a sample of calls per CCR each month to monitor and evaluate performance. The sample size is either a predetermined number or a percentage of all received calls. With targeted sampling, new CCRs, and those who have received lower scores during prior monitoring exercises, are subject to more frequent and focused monitoring until they have achieved a level of performance that aligns with our quality standards.

[REDACTED]

5.5.2.2.2 Live and Recorded Call Assessment

Our methods and techniques for reviewing live and recorded calls received by our CCRs to assess their performance against established QC standards, confirm the accuracy of their responses, and round out the statistical data we report to the Exchange, are summarized below.

[REDACTED]

5.5.2.3 Internal Self-Audits

Appendix B Reference #285

MAXIMUS audits the accuracy of work performed under this contract, proactively addresses areas of concern, and educates and retrains staff when necessary based on results of the following internal monitoring mechanisms.

5.5.2.3.1 Trend Analysis

The Exchange Call Center must be able to quickly and effectively handle service requests from customers, identify the factors that prompted their requests, and understand their use of self-service and call center CCR options. [REDACTED]

[REDACTED]

Monitoring Changes In Channel Usage by Customers

[REDACTED] Supervisors can analyze trends and usage of each channel and

determine where customers abandon lower-cost channels, such as IVR menu options, in favor of talking to a CCR. These tools also provide us with the capability to track cost per contact, channel response times, and customer channel preference. Understanding how channels are used and identifying problem areas enables us to make improvements and point customers in Connecticut to the best channel for each type of interaction.

Improving CCR Effectiveness and Reducing Turnover

[REDACTED]

Maximizing Productivity and Resources

[REDACTED]

5.5.2.3.2 Monthly Assessment of Call Center Staff Needs

CCRs in the Exchange Call Center will be surveyed monthly and given the opportunity to provide anonymous feedback to our management team. By soliciting and acting on this candid feedback, we will be able to identify areas for improvement and develop additional opportunities for staff development. By empowering CCRs with a mechanism to voice their opinions, they have more buy-in to perform the day-to-day work. We find that team members take more pride in their jobs when they have input into how their work is performed.

Taking Appropriate Action on Feedback from Call Center Personnel

Feedback we receive from the monthly staff needs assessment survey will be used in several ways. We will analyze the data to identify workflow bottlenecks that lend themselves to process improvement and develop recommendations for making changes. In addition, we will identify issues or problem areas and develop an action plan for addressing the feedback received. Furthermore, we will conduct staff development training that supports our succession plan and further empowers team members to perform at the highest level. Priority is given to those problem areas that have the highest potential impact on the Exchange.

5.5.2.3.3 MAXIMUS Office of Quality and Risk Management

MAXIMUS approaches quality and compliance both as an internal project function and as a corporate responsibility. Our corporate Office of Quality and Risk Management (QRM) was created and empowered to promulgate a corporate commitment to quality and continuous improvement across all projects. QRM coordinates our quality efforts, facilitating the sharing of best practices between projects, focusing on improving project execution, maintaining contract compliance, and ensuring that quality-focused practices are implemented throughout the company so that we may continue to provide exceptional service to, and mitigate risks for, our clients.

[REDACTED]

5.5.2.4 Automated Customer Satisfaction Surveys

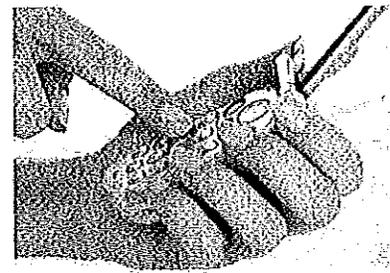
Appendix B References #267 - 279, 281 - 283

Achieving a high rate of caller satisfaction is essential to operating a successful call center, especially one as visible as the Exchange Call Center. Evaluating the satisfaction of the people we serve is an important part of our overall approach to continuous quality improvement and helps us to evaluate our ability to provide effective services. [REDACTED]

[REDACTED]

We are prepared to discuss with the Exchange our methodology for conducting customer satisfaction surveys using outbound IVR campaigns to meet the RFP requirements for randomness and minimum survey sample size. This includes completing the surveys with caller samples that are representative of the services provided and the types of requests received, as well as providing suggestions for improvement based on the survey findings. In addition, we are prepared to work with the Exchange to finalize a process for responding to customer complaints on an individual basis. For additional information on our process for handling customer complaints, please see *Section 5.5.5: Problem and Complaint Management*.

[REDACTED]



[REDACTED]

[REDACTED]

We anticipate rolling-out this type of survey for the Exchange Call Center.

[REDACTED]

[REDACTED]

This can be useful in determining if there is a particular aspect of the IVR that callers are not satisfied with, enabling us to make improvements.

5.5.2.4.1 Analysis and Reporting of Survey Data

[REDACTED]. It also serves as an excellent feedback forum, which helps us continuously improve our service at the individual CCR level and for the project as a whole. A summary of our plan for analyzing and reporting on survey results to the IEPMO and the QA vendor on a monthly basis is presented here.

[REDACTED]

5.5.3 Service Level Agreements

Appendix B References #75 - 85

Our goal is to meet or exceed our contractual Service Level Agreement (SLA) metrics and performance standards through the delivery of truly superior customer service. We meet SLAs and performance standards by implementing proven technology, maintaining a pool of highly qualified staff, and empowering them with the tools they need to provide accurate and consistent information in the most efficient manner. By staffing the Exchange Call Center with the right number of well-trained staff, monitoring call activity throughout the day, and adjusting staff responsibilities as needed, we are positioned to consistently deliver the level of service the Exchange expects from us.

Analyzing call center metrics is part of our overall approach to quality assurance. Through continuous assessment of quantitative data, our infrastructure and staffing are kept proportional to expected call volumes at various times of the day and week. This not only provides a foundation for meeting call center performance standards, it also creates a work environment in which our CCRs are able to handle their workloads efficiently and productively.

Our call center management team has extensive experience analyzing call data to evaluate immediate and longer-term staffing needs, and this is enhanced by our workforce management system. Call volume projections as well as known call lengths based on historical information allow us to identify the optimum number of CCRs needed to answer calls quickly and minimize caller hold times, callback queues, and abandonment rates. We are also able to analyze historical information to determine call volume behavior after a large mailing of re-enrollment packets, the day after a holiday, or the busiest day/week/month to inform our staffing coverage. Our workforce management tool further supports the actual staffing at any given time to make certain that we manage time off, breaks, and off-the-phone time for training and other tasks without impact to the performance standard.

Our overall approach to meeting the SLA metrics for the Exchange Call Center is shown in *Exhibit 5.5-7: MAXIMUS Approach to Call Center Performance Standards*.

Performance Standard	MAXIMUS Approach to Compliance
The Call Center will answer 90% of calls within 30 seconds, 95% of calls within 45 seconds, and 99% of calls within 60 seconds over a measurement period of each day.	[REDACTED]
The Call Center shall incorporate industry standards for average speed of answer metrics (20 seconds or less).	[REDACTED]

Exhibit 5.5-7: MAXIMUS Approach to Call Center Performance Standards. *Our telephony solution, CRM system, and Quality Assurance program are all used to help ensure compliance with call center performance standards.*

Performance Standard	MAXIMUS Approach to Compliance
The Call Center shall incorporate standards for the average time Call Center personnel spends on calls - minimum acceptable goal 65%.	[REDACTED]
The Call Center will ensure that the weekly average wait or hold time will not exceed 120 (one-hundred twenty) seconds per call.	[REDACTED]
The Call Center shall incorporate standards for abandon rate (less than 5%).	[REDACTED]
The Call Center shall incorporate standards for first call resolution (resolvable calls) - 85%.	[REDACTED]
The Call Center shall incorporate standards for metrics for first call resolution (all calls) 65% or greater.	[REDACTED]
The Call Center shall establish a 90% consumer satisfaction goal or better.	[REDACTED]
The Call Center shall incorporate standards for average handle time - talk time before a call is resolved, closed at Tier 1 or transferred to Tier 2 plus documentation time - goal 9.5 minutes or less.	[REDACTED]
The Call Center shall incorporate standards for average time spent by Call Center personnel off the phone - research, training, administrative work, etc. goal 20% or less.	[REDACTED]
The Call Center will ensure that the weekly average number of incoming calls that are blocked (calls receiving a busy signal) will be no more than 1%.	[REDACTED]

Exhibit 5.5-7: MAXIMUS Approach to Call Center Performance Standards (continued). *Our telephony solution, CRM system, and Quality Assurance program are all used to help ensure compliance with call center performance standards.*

MAXIMUS has a track record of operating efficient and responsive call centers. *Exhibit 5.5-8: MAXIMUS Call Center Performance* illustrates our performance on call abandonment rates and speed to answer by live voice. It demonstrates that although needs and standards may vary across projects, we consistently deliver the call center performance our clients require.

MAXIMUS Medicaid Managed Care Enrollment Projects	Average Number of Calls per Month	Call Abandonment Rate			Speed to Answer (by live voice)		
		Performance	Standard	Standard Met?	Performance	Standard	Standard Met?
California Health Care Options	████	████	████	✓	████	████	n/a
Georgia Families	████	████	████	✓	████	████	✓
HealthColorado	████	████	████	✓	████	████	n/a
Massachusetts MassHealth Customer Services	████	████	████	✓	████	████	✓
Pennsylvania Enrollment Assistance Program	████	████	████	✓	████	████	✓
Indiana Enrollment Broker	████	████	████	✓	████	████	✓
Michigan ENROLLS	████	████	████	✓	████	████	✓
New York Health Options Enrollment Center	████	████	████	✓	████	████	✓
Texas Enrollment Broker Services Project	████	████	████	✓	████	████	✓
Vermont Green Mountain Care Member Services Project	████	████	████	✓	████	████	✓

Exhibit 5.5-8: MAXIMUS Call Center Performance. Our proven approach has enabled us to meet similar call center performance standards.

As required by the RFP, CCRs in the Exchange Call Center will be available to answer telephone calls during regular business hours, 8:00 a.m. to 8:00 p.m., Eastern Time, Monday through Friday except at times for system maintenance approved by the Exchange and designated State holidays.

5.5.4 Monitoring of Call Center Performance by the QA Vendor

Appendix B References #131 – 136

We collectively share the importance of accurate and timely reporting and transparency of our call center performance for both the Exchange and the QA vendor. We acknowledge that specific components of our operation are subject to ongoing, periodic, and random inspection by the Exchange’s QA vendor. These components include deliverables, call center scripts, performance metrics, SLAs, and customer survey results. We agree to provide complete access to our processes, procedures, reports, data, and instructional materials. We will work closely with the Exchange and the QA vendor to remain aligned with Exchange policies and operations. Through these collaborative efforts, we can develop, track, and report on SLA metrics with the goal of achieving high quality scores and improving these scores

wherever possible. We will submit a monthly report of recorded call center performance results to the Exchange.

Quantifying Attributes of Responsiveness, Accuracy, and Timeliness

We will work with the Exchange to develop and quantify appropriate attributes of responsiveness, accuracy, and timeliness that can be incorporated into our performance metrics. Once approved by the Exchange, these key attributes will be monitored and evaluated monthly to assess their impact on the experiences of Exchange customers.

By monitoring and evaluating our performance on responsiveness and accuracy attributes, we help ensure that we provide Exchange customers with accurate information that meets their needs, that all services delivered under this contract conform to our internal acceptance criteria for quality, and that we take action proactively to resolve any emerging problems or areas of concern with respect to quality issues. By tracking and evaluating our performance on timeliness attributes, we can allocate staff resources and assign priorities to help ensure that process bottlenecks are avoided and that timeliness standards and impending deadlines are met.

Using Qualitative Methods to Assess Importance of Attributes

[REDACTED]

[REDACTED] Our analysis will generate valid and reliable data on the importance of these attributes and the impact they have on customers' overall experience and levels of satisfaction or dissatisfaction with the Exchange at the program level.

5.5.5 Problem and Complaint Management

Appendix B References #135 - 136, 208 - 221, and 280

Despite our strong focus on First Call Resolution and our commitment to providing customer service of the highest quality, MAXIMUS recognizes that inevitably we will receive and handle problems customers might have regarding account set-up and password resets, navigation through the web portal interface, and understanding of frequently asked questions (FAQs) as well as complaints they might have regarding the Exchange system, enrollment with the wrong qualified health plan (QHP), and our performance as the Exchange Call Center vendor. Throughout this section, we have discussed various processes, methods, and tools we use to deliver high quality customer service. We use many of these same methods and tools to prevent or reduce the incidence and recurrence of customer complaints.

[REDACTED]

While we employ many techniques to minimize the incidence of complaints, we understand the need to have a complete solution to document complaints when they occur. The Exchange Call Center is

equipped to accept complaints by a variety of channels including those received by telephone, mail, e-mail, or fax. Complaints can span a wide range of issues. We train our staff to respond to the varying needs for assistance according to each individual program's guidelines, from explaining the complaint process to referring them to the correct department or agency, as appropriate.

We attempt to resolve most complaints with the customer on the first call. However, the nature of an inquiry or complaint occasionally necessitates escalating a Tier 1 call to a Supervisor or transferring the call to Tier 2 staff for further assistance. CCRs will be specifically trained so that they can handle many complaints while knowing when to escalate an issue to a Supervisor or transfer the call to Tier 2 staff. In addition, CCRs will understand when it is appropriate to transfer calls to other call centers such as CID and OHA. [REDACTED]

Many complaints arise out of a lack of understanding of program services or actions on the part of the others involved in their case or situation. Handling these complaints is often a matter of helping the caller understand the program, associated actions and laws, and providing them the knowledge they need to help them see the situation for what it is or seek further assistance through a referral to a licensed broker or other appropriate department or agency.

We will notify the Exchange within 24 hours of receiving a complaint regarding our staff. We take these types of complaints very seriously as they can reflect on the level of customer service we provide. We respond to the complaint within 24 hours and will provide documentation to the Exchange regarding the complaint resolution or timeframe for planned resolution. If we do not respond within 24 hours, we will provide the Exchange with a schedule for resolving the complaint. We understand that the Exchange has the final say as to the timeframe and method of resolution. We understand, too, that we are responsible for handling oral complaints, and we will forward copies of written complaints to the Exchange within 48 hours of receipt.

[REDACTED]

Tracking Inquiries and Complaints for Accuracy of Direction/Distribution

[REDACTED]

[REDACTED]

[REDACTED]

Developing a Problem and Complaint Management Plan

MAXIMUS intends to meet with the Exchange at the outset of the implementation period to review the policies and procedures in our preliminary Problem and Complaint Management Plan. Following approval by the Exchange, we will update the Plan periodically and distribute the revised document to designated Exchange staff. We understand that this Plan covers all problems and complaints that fall within the scope of our responsibility under this contract. We also understand that a problem or complaint is not closed out until we receive validation from the Exchange that the issue is resolved.

Responding to Customer Complaints

On similar call center projects, we have created and maintained policies and processes that our CCRs follow when responding to and resolving customer complaints or expressions of dissatisfaction with services that are controllable by us under our scope of work. These processes include responding to Exchange-related complaints on an individual basis with a customer to help resolve his or her issue. For example, we might initiate a three-way call with the customer and the other entity to help resolve a problem or achieve a positive outcome, refer the customer to the appropriate entity for resolution, help the customer search for a different broker or QHP, or complete a warm transfer to an outside entity to help ensure the customer speaks with the right person. We will work with the Exchange to finalize our policies and procedures related to the handling of customer complaints.

Developing Monthly Action Plans

[REDACTED]

Reporting to the IEPMO and QA Vendor

[REDACTED]

This functionality allows the Exchange to effectively trend and manage recurring problems identified through the Exchange Call Center. It also allows Exchange Consumer Support to participate in our continuous process improvement activities that promote end-to-end problem management.

5.6 Information Security, Data Privacy, and Sarbanes-Oxley (SOX) Compliance

RFP Section 4.4.6, page 23; Appendix B References #23, 290 - 293

As a leading government contractor operating health and human services projects in the United States, Canada, Australia, and elsewhere, MAXIMUS has an ingrained understanding of security requirements for our government contracts. We work hard to uphold the trust placed in us by our clients and the consumers we serve by safeguarding the systems, consumer information, and our own facilities and personnel as part of our core competencies and proven security strategies.

Our established best practices and corporate oversight help us meet the high expectations associated with operating projects that handle protected health and other personal information, and we will incorporate this deep knowledge into our solution design for the Exchange Call Center.

Security Standards That Guide Our Ongoing Security Strategy

- Department of Defense Information Assurance Certification and Accreditation Process (DIACAP)
- NIST Special Publications 800-18, 800-53, and 800-30
- Sarbanes-Oxley (SOX) Act of 2002
- Federal Information Security Management Act of 2002 (FISMA)
- Carnegie Mellon University's Software Security Engineering Capability Maturity Model (SEI-CMM)
- National Security Agency's (NSA) INFOSEC Assessment Methodology (IAM)

5.6.1 Information Security and Data Privacy

Appendix B References #292, 293

MAXIMUS provides information technology services and supportive systems to a wide variety of state health and human services, child welfare, education, financial, and federal agencies. We have assisted our clients in the planning, design, procurement, and implementation of information systems, including Medicaid eligibility and enrollment systems, Statewide Child Welfare Information Systems, Student Information Systems, child care management and child support enforcement systems, enterprise resource planning systems, and public employee retirement systems. [REDACTED]

[REDACTED] These connections are in addition to the many state client connections we have implemented and maintain in conjunction with state technical staff and in line with state security requirements.

Our Information Security Policy, maintained by our corporate Office of Information Security (OIS) Security and Audit group, defines the requirements pertaining to physical and information security, as well as authorized use of systems, connections, and equipment. This policy is followed by our corporate office and all project offices, with project-specific and client-specific requirements appended to tailor the policy to meet project and program needs.

The Exchange Call Center will benefit by our experience and knowledge of what is needed to protect consumer data, program information, systems, and facilities from unauthorized access. Information security and data privacy are inextricably intertwined, necessitating a comprehensive approach to

protecting the consumer information entrusted to us. The following subsections present our strategies for securing physical facilities and restricting equipment access, maintaining data security and network services, protecting consumer data—including using the Interactive Voice Response (IVR) system, training staff and subcontractors on security requirements, and incident response and reporting. In addition, all staff and subcontractors with access to consumer data undergo background checks and are required to sign confidentiality agreements that acknowledge their understanding of our security policies and procedures. All these elements join to form our security solution for the Exchange Call Center. We will collaborate closely with the Exchange's Security/Compliance Office to ensure that appropriate protocols are in place to safeguard against unauthorized access, destruction, loss, or alteration of the Exchange data under our purview, and we will finalize our security plan for the Exchange Call Center during the transition period for your review and approval.

5.6.1.1 Physical Security and Equipment Security Controls

Appendix B References #290

Our physical security is comprehensive, safeguarding against unauthorized access to our facilities and thus our systems and data. Some of our physical security protocols include:

- **Controlled Access to Facilities:** A standard element of our corporate Information Security Policy prescribes controlled building and office access, as well as security and identification badges for employees, visitor badges, visitor sign-in sheets, and visitor escorts. We will follow these same guidelines for our Exchange Call Center facilities. Having controlled entry points virtually eliminates the potential for physical incidents and unauthorized entry. Access to our work areas is restricted to MAXIMUS employees, and authorized subcontractor staff, vendors, and designated Exchange staff. The main entry is staffed by reception/security personnel during business hours, while other entry points remain locked. Our sites have alarm, magnetic security card, and/or camera surveillance systems installed. Once individuals pass these initial systems, additional access control systems regulate their access to various areas. Access control systems prevent unauthorized persons from entering secured areas.
- **Employee Identification Badges:** All employees are required to display their identification badges at all times while on the premises. These badges are also coded to provide or prevent appropriate levels of access to various areas throughout the facility.
- **Visitor Logs:** We require visitors—anyone without a previously cleared identification badge—to sign in at the reception area when entering the premises. The visitor log requires the name and company the person is with and the name of the person they are visiting, as well as the time in and time out. The visitor then receives a visitor badge and is escorted to his or her destination. The badge is returned when the visitor leaves and signs out.
- **Smoke Detectors and Intrusion Alarms:** MAXIMUS protects data center environments with smoke detection sensors and a fire suppression system with automatic alarms that are also tied into



All visitors to MAXIMUS sites are required to sign a visitor log at the reception desk and wear a visitor badge while on the premises.

building security systems. For the Reston and Rancho Cordova data centers, the system is monitored by an outside security agency, notifying designated MAXIMUS staff 24/7 of alarms that occur.

- Locked Files:** The Exchange Call Center's confidential documents will be safely stored in locked filing cabinets or rooms with limited, authorized access. Files detailing confidential information are stored, when not in use, in locked cabinets or within offices or rooms that can be locked. Any off-site storage of older documents is done in facilities with access limited to appropriate MAXIMUS staff. We will work with the Exchange and other key stakeholders to determine the optimal time for maintaining hard copy documents, a schedule and method for proper disposal/shredding of those documents, and the retention timeframe for all Exchange documents—at least the length of the contract.

- Limited Access Data Centers:** [REDACTED]

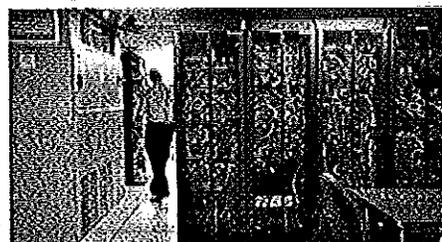
Security Measure			
Building Locked During Off-Hours	✓	✓	✓
Building/Office Alarmed for Intrusion	✓	✓	✓
Front Desk Reception/Security personnel during office hours	✓	✓	✓
Security Badge needed for other than main entrance	✓	✓	✓
Security surveillance cameras	✓	✓	✓
Internal document and equipment storage, file room, administrative, and other areas require appropriate security badge access	✓	✓	✓
Server/Telecom Rooms require authorized security badge to enter	✓	✓	✓
Intercom Paging System	✓	✓	✓

Exhibit 5.6-1: MAXIMUS Physical Security Measures. *Maintaining physical security is only one facet of our comprehensive security policies and procedures, which protect individual privacy and confidentiality.*

5.6.1.2 Data and Network Security

We use a variety of methods to protect the confidentiality, integrity, and availability of data transmitted via the Internet and our corporate network, including encryption protocols.

[REDACTED]



Our Network and Data Center security meets applicable laws and regulations governing the handling of PHI and PII for our projects.

[REDACTED]

[REDACTED]

5.6.1.3 Protecting Consumer Data

Appendix B Reference #291

MAXIMUS champions the right to privacy for the consumers we serve. Our comprehensive approach to security is based on experience implementing security policies and protocols that cover physical and electronic access to confidential information. We understand data security requirements, the need for confidentiality, the rights of consumers, and associated privacy and confidentiality laws and regulations. As part of our Exchange Call Center operations, we are clearly committed to protecting all Protected Health Information (PHI), Personally Identifiable Information (PII), and other confidential consumer data.

We comply with all applicable state and federal regulations related to security and confidentiality, as well as HIPAA administrative, technical, and physical safeguard requirements. During systems design and development, issues specific to Federal Information System Processing Standards (FIPS) and HIPAA are an integral part of the application design considerations. As we address new business rules, we include these privacy and security considerations.

Our experience implementing secure, self-service IVR channels will benefit Connecticut consumers and help ensure that their information is safeguarded against unauthorized access. [REDACTED]

Security Compliance

Sanction Policy

The Health Information Technology for Economic and Clinical Health Act (HITECH), part of the American Recovery and Reinvestment Act of 2009 (ARRA) expanded the scope of the Health Insurance Portability and Accounting Act of 1996 (HIPAA) to require that Business Associates have and apply appropriate sanctions against members of their workforce who fail to comply with the privacy and security policies and procedures of the entity. MAXIMUS has developed a Privacy and Security Sanctions Policy to define staff sanctions. This policy establishes MAXIMUS policy, guidance, and standards for workforce performance expectations in carrying out the provisions of HIPAA/ARRA, and the corrective actions that may be imposed to address privacy or security violations. Depending on the severity of the incident, actions may include a corrective action plan, re-training, written warning, or termination of employment.



5.6.1.4 Security Training for Staff and Subcontractors

The MAXIMUS commitment to adhering to privacy and security requirements is evident in our training program, which includes modules on Information Security Awareness and HIPAA compliance. Every MAXIMUS employee working at the corporate office and in our project locations throughout the United States attends an orientation session that includes the review of confidentiality issues inherent to the health services line of work. Armed with appropriate knowledge, our staff is keenly aware of policies on appropriate handling and disclosure of confidential consumer information. We educate our employees on all aspects of privacy and security-related policies, provide them with online access to all applicable corporate and project policies, and test their knowledge related to the material taught. Training includes project site safety and emergency response procedures to security threats. Employees are required to take all compliance training before receiving their security badges and access, and regular refresher training and situational reminders to reinforce the importance of compliance. Our subcontractors who have access to PHI/PII are subject to the same strict security requirements, and we provide them with appropriate instructions about handling this information.



We train all staff on how to properly handle and disclose confidential consumer information and to report intentional and unintentional actual or suspected violations.

5.6.1.5 Incident Response and Reporting

Our Incident Response Plan stresses two fundamental principles. The first is the importance of following well-defined and systematic procedures to respond to security-related incidents. By identifying the key elements of incident response activity—including preparation, detection, containment, eradication, recovery, and follow-up—we provide a proven set of considerations to use as a basis for developing custom procedures tailored to the specific operational environment for the Exchange Call Center.

Even if incident response efforts are conducted systematically, they are of little value if conducted in isolation. Coordinating efforts with others is a critical factor in planning for successful incident response. For instance, sharing data about intrusions, viruses, and malicious code can enable others to prevent or more quickly recognize and eradicate the cause of incidents. Cooperation among MAXIMUS personnel at both our corporate OIS and at our projects can drastically reduce the number of incidents, the

manpower needed to respond to incidents, and can be invaluable should a legal investigation become necessary. Training on incident response has been incorporated into our security awareness training.

MAXIMUS also has a PHI/PII Incident Reporting Procedure which mandates the prompt completion of a PHI/PII Incident Report by staff after discovery of a possible privacy or security incident that may result in a breach. The PHI/PII Incident Report must be submitted to project management and the corporate Privacy Official. The corporate Privacy Official and/or Information Security Officer will work with the project management staff to investigate and report the incident to the Exchange's Security/Compliance Officer, or other designated individual, within the agreed upon timeframe. The incident will be investigated, with participation by the Exchange, and a written report will be submitted. If the incident has not been fully resolved, we will continue to update the Exchange on a regular basis and involve you in the investigation, as appropriate. A root cause and process improvement plan is developed for each incident that may include policy and procedures changes, documentation revisions, a review of access control levels, and/or re-training of staff.

5.6.2 SOX Compliance

Appendix B Reference #293

As a public company, MAXIMUS has established processes and internal controls that comply with the rigorous requirements of the Sarbanes-Oxley (SOX) Act of 2002. This makes management responsible for establishing, evaluating, and assessing over time the effectiveness of internal controls over financial reporting. These controls are tested by an independent public accounting firm, and we have received unqualified (clean) audit opinions. Our most recent annual report is available online at www.maximus.com under "Investor Relations," *Exhibit 5.6-2: Sarbanes-Oxley Certification* shows the compliance certification from our 2011 Annual Report.

EXHIBIT 31.1

Certification Pursuant to Section 302 of the Sarbanes-Oxley Act of 2002

I, Richard A. Montoni, certify that:

1. I have reviewed this Annual Report on Form 10-K of MAXIMUS, Inc.;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;
4. The registrant's other certifying officer and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:
 - a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;
 - b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;
 - c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and
 - d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting.
5. The registrant's other certifying officer and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):
 - a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and
 - b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

Dated: November 14, 2011

/s/ RICHARD A. MONTONI
Richard A. Montoni
Chief Executive Officer

Exhibit 5.6-2: Sarbanes-Oxley Certification. As a publicly traded company, MAXIMUS is bound by SOX requirements, as shown in our most recent Annual Report available.

5.7 Transition and Knowledge Transfer Plan

RFP Section 4.4.7, page 23; Appendix B References #226 - 237

The Exchange Board is faced with a changing health care landscape and service delivery model for the Exchange Call Center. MAXIMUS will leverage our considerable call center experience to serve as a partner to you every step of the way. Our proven technologies, best practices, and knowledgeable leadership present the Exchange with the lowest risk choice for implementing the Exchange Call Center for assisting Connecticut consumers.

5.7.1 Transition from Current Environment

RFP Section 4.4.7, page 23; Appendix B Reference #233

Making a decision to transition from the current model to the Future Environment may present seemingly difficult challenges, but the Exchange can rest assured that our depth of experience, proven technology, and qualified leadership team will overcome these challenges and mitigate risk to the Exchange and Connecticut consumers. Only when the contractor you choose has demonstrated significant practical experience in managing all aspects of transitioning similar call center projects of comparable scope, can the Exchange Call Center be smoothly transitioned to successful operations. In addition, your vendor should have a strong corporate commitment to providing appropriate resources and support and should understand the complexities of transition planning and execution. MAXIMUS provides this and more.

We will work closely with the Exchange to accommodate a single toll-free number for consumers to call for assistance with their health care insurance options and choices. This consolidated, "no wrong door" approach presents the opportunity to integrate with existing consumer assistance services in Connecticut, including the Connecticut Insurance Department, Office of the Health Care Advocate, the Integrated Eligibility System vendor, Deloitte—with whom we have worked in the past, and the Department of Social Services Benefits Center. In addition, we will need to coordinate our operations with Exchange staff and Tier 3 support in order to uphold our role in seamless, end-to-end services for Connecticut consumers.

MAXIMUS strategy includes comprehensive planning, well-defined communications protocols, and closely monitored progress toward completing milestones on time. Having successfully transitioned from a variety of different service models and incumbents, we understand the inherent pitfalls and risks associated with such transitions, including implementations and start-ups. We have developed and documented best practices over time that will serve to smooth the way for a successful Exchange Call Center transition.

5.7.2 Expectations for State Support

RFP Section 4.4.7, page 23; Appendix B Reference #233

We identify some tasks in our Transition Plan that will depend upon Exchange resources for input, review, approval, meeting, or other involvement. We understand that the Exchange Team, including other Exchange vendors, will be an integral part of the successful Exchange Call Center transition, and we look forward to further defining roles and responsibilities upon contract award. We feel certain that our mutual goals for serving Connecticut consumers will drive the motivation to participate in key aspects of the transition.

5.7.3 Transition Plan

RFP Section 4.4.7, page 23; Appendix B References #233 -- 235

With the understanding that our preliminary Transition Plan is presented in *Section 7: Project Timeline*, the following sections give some detail around our transition methodology, team roles and responsibilities, deliverables, approach to meeting your requirements for the call center, governance, and steady state metrics. The implementation of this plan needs to be done in collaboration with a number of parties to obtain the needed prior approvals and to synchronize the timing of Exchange Call Center events with dependent technology deployments from other State owners, vendors, and third party service providers. For example, training of CCRs on the professional users Exchange portal must be synchronized with the timeline that Deloitte uses to complete this technology tool.

5.7.3.1 Methodology and Philosophy

RFP Section 4.4.7.1, page 23

The Exchange needs to be able to trust its vendor to transition the Exchange Call Center to the new model as seamlessly as possible, using proven project management methodology. MAXIMUS will continue our practice of following industry-standard best practices to make certain that we transition and operate the Exchange Call Center in a disciplined, consistent manner that promotes the delivery of quality services to Connecticut consumers.

[REDACTED]

[REDACTED]



The ongoing project management community is actively involved in sharing and documenting project management and transition experience, lessons learned, contingency planning, and best practices. Our project managers and transition/implementation managers have a pool of experience and resources to draw upon in order to help them meet similar challenges.

[REDACTED]

[REDACTED]

We have found that by adhering to these policies and procedures, our projects start on equal footing to operate in a disciplined, well-managed, and consistent manner that promotes the delivery of quality deliverables and services.

The Exchange Call Center presents additional challenges in that it is a different model and represents a new service delivery for consumers. There are multiple vendors and agencies involved, requiring meticulous coordination. Our approach to successfully meeting these challenges involves:

- **Extensive pre-planning:** We have already identified our Transition Team, and they are poised to officially begin their tasks. For a complex program such as the Exchange Call Center, this pre-planning is key to successfully completing the transition to the new service delivery model in Connecticut.
- **Experienced team:** Our team has experience implementing complex projects with the same types of challenges as the Exchange, such as in New York and Vermont.
- **Risk Mitigation:** We define the risks associated with transitioning and implementing the project, identify solutions, and build in contingencies for potential issues.
- **Knowledge Transfer:** We develop a plan for gathering and sharing information with a previous contractor or the Exchange Team in order to be able to continue operations, providing consumers a seamless experience transitioning to MAXIMUS. While the Connecticut Exchange Call Center is not a direct takeover from an existing vendor, there are components of the call center scope that require coordination with existing vendors as well as transitions and integrations with some of their functionality.
- **Corporate support:** We have experts available to support the team if an unanticipated situation occurs that requires more or different resources, many of whom are available within the MAXIMUS Health Services operations team and our vendor partners.
- **Quality and Risk Management readiness review assistance:** [REDACTED]

[REDACTED]

MAXIMUS implements and maintains comprehensive strategies for all facets of transition and project management and will apply our best practices to help ensure that the Exchange Call Center implementation is managed with the professionalism, thoughtful planning, and expertise it requires.

Transition Team Role	Transition Responsibilities
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Exhibit 5.7-1: Transition Team Roles and Responsibilities (continued). Carefully defining Transition Team roles and responsibilities, including the Exchange's involvement, will result in a smoother, more seamless transition to the new service delivery model.

5.7.3.3 Deliverables

RFP Section 4.4.7.3, page 23

Exhibit 5.7-2: Transition Phase Deliverables presents the plans, procedures, and other deliverables we expect to complete during the transition phase of the Exchange Call Center.

Deliverable	WBS	Overview of Key Tasks	Proposal Section with Detailed Description
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Exhibit 5.7-2: Transition Phase Deliverables. We will carefully review all contract deliverables with the Exchange upon contract award and establish specific due dates, review procedures, and expectations.

Our work plan tasks and milestones have been scheduled with these phases in mind. In addition, we will work closely with the Exchange and other key vendors, such as your Integrated Eligibility System vendor, to accommodate additional phases of system releases and centralization of the DSS Benefit Center. Throughout the Transition phase, we keep the "no wrong door" approach at the forefront and will continue to coordinate our activities with those of other agencies involved in providing services for the Exchange.

5.7.3.4.2 Timeline (high-level)

RFP Section 4.4.7.4.b, page 23

Exhibit 5.7-3: Timeline shows the high-level timeline for accomplishing key milestones identified for the Exchange Call Center transition.

Exchange Call Center

5.7.3.4.3 Service changes required to move to outsourced model

RFP Section 4.4.7.4.c, page 23

MAXIMUS recognizes there are many moving parts for the Exchange to keep track of as they move to the new service delivery model for serving Connecticut consumers. The Exchange will advertise the new toll-free number for the Exchange Call Center in materials, on their website and IVR recordings. This will help to build awareness of the new call center and its functions, and:

- We will collaborate with the Exchange, CID, OHA, DSS, Brokers, Navigators, and other stakeholders to help ensure everyone has a common understanding of which inquiries are referred to which entity. This may involve coordinating telephony messaging to help consumers understand what is coming.
- We will integrate our IVR system with the DSS Benefits Center in order to more efficiently serve consumers in the most seamless way possible.

[REDACTED]

5.7.3.4.4 Process specific transition approach

RFP Section 4.4.7.4.d, page 23

We use a process-specific approach to our transition in that each task is associated with a larger process that defines a business function or service key to successful operations. For example, answering a telephone call from a consumer is one small part of the whole process for call handling. [REDACTED]

[REDACTED]

[REDACTED] This is just a way of saying that all tasks are related to a bigger picture of our solution components for the Exchange Call Center. We have organized our work plan around these major processes as a convenient way of grouping them and showing their relationships and dependencies.

5.7.3.4.5 Any off-site location requirements/impacts

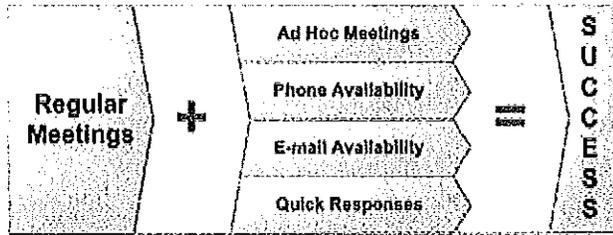
RFP Section 4.4.7.4.e, page 23

[REDACTED]

5.7.3.4.6 Communication approach and responsibilities

RFP Section 4.4.7.4.f, page 23

Tight timelines and the need for the Exchange Call Center to appear to the public as a "seamless" part of the program require a well-defined communications strategy. In addition, a scope of work that includes program changes and adjustments in how consumers are served requires well-timed and thorough explanations to make certain there is uniform clarity and consistency in the understanding and execution of policies. During transition and throughout the life of the contract, our project staff and corporate leadership are available to the Exchange through meetings, email, telephone, and in-person communication.



MAXIMUS schedules time for meetings with the Exchange and remains available for discussion with all key stakeholders, keeping the lines of communication open throughout the life of the contract.

Open communications and operational transparency are critical to developing a trusted partnership with the Exchange, CID, OHA, DSS, and other key stakeholders. Our project management strategy includes communications and governance protocols that address external and internal communication schedules, methods, and venues. It is through our close collaboration and partnership with the Exchange Team that we are able to squarely meet challenges and resolve them quickly and effectively.

During the Transition phase, we intend to meet weekly—or at some other agreed upon frequency—with the Exchange and other involved partners to review and report on the status of implementation activities. Written updates to the Transition Work Plan will be made available on the KMS where those with appropriately assigned credentials can access the Work Plan and other status reports related to the transition phase of the Call Center. Periodic status calls may also take place, particularly with sub-groups of the Transition Team, as team leads work with their teams to accomplish their assigned tasks.

We find that a tiered, organized communication strategy works very effectively during implementation. The key partners for the Exchange and MAXIMUS must establish an initial level of trust and collaboration. This executive level of communication sets the tone and expectations for the contract, work plan, general interactions, and escalation procedures. By establishing this solid foundation, future discussions during implementation and ongoing operations are facilitated in a successful manner.

[REDACTED]

Depending on the depth of Exchange resources assigned to this project, there may also be a more focused ongoing dialogue, such as system, call center, and training communication. Facilitated by the Exchange, meetings to transition to the future state model and to coordinate the link between the various agencies and vendors involved are recommended.

[REDACTED]

E-mail, telephone, in-person contact, and any other appropriate channel will be discussed and made available to support these efforts.

5.7.3.4.7 Knowledge transfer approach and responsibilities

RFP Section 4.4.7.4.g, page 23

A successful transition for any project allows for continued, quality operations as the new contractor begins the preparation and start-up phase. The key to a successful transition for the Exchange Call Center will be full and open communication on a regular basis with the Exchange, CID, OHA, DSS, and other key stakeholders throughout the process. This strong focus on open lines of communication will help enable us to better understand the scope and magnitude of the services and infrastructure in the current configuration, while translating that into the new model for service delivery. MAXIMUS stands ready to cooperate with all involved entities to facilitate a smooth transition that will be seamless to Connecticut consumers.

Our team is acutely aware of the importance of having a carefully conceived transition plan and strategy, and we also understand what it is to be on the successor's side. Every member of the Transition and Account Team has had experience transitioning out of a contract and that understanding and lessons learned will be brought to bear on this transition. We also recognize how critical it is to proactively focus on the impact that the transition will have on staff, processes, technology, and consumers, and we will help ensure that there are no disruptions to the important services currently being provided.

In order to fully facilitate knowledge transfer during the transition phase, we make sure to:

- Finalize the Transition Plan and share with all parties
- Review the current contracts, if appropriate, to identify their turnover requirements
- Document expectations, targeted completion dates, and acceptance criteria for information related to knowledge transfer; discuss with the entire group to reach consensus on understanding and commitments of timeline and resources
- Update Transition Plan with agreed-upon deliverables and schedule
- Recommend that there be a main point of contact for each major stakeholder
- Create and distribute a contact list of the parties involved
- Provide timely reports of progress on receiving information related to the knowledge transfer
- Suggest weekly/bi-monthly meetings with the Exchange and other stakeholders specifically focused on knowledge transfer items
- Document and distribute meeting minutes

A clear definition of expectations is key to successfully transferring knowledge from all agencies during the transition phase and beyond.

5.7.3.4.8 Readiness testing/assessment approach and responsibilities

RFP Section 4.4.7.4.h-4.4.7.4.i, page 23

In implementing our health services operations projects, MAXIMUS participates in a Readiness Assessment process conducted in collaboration with our state clients, subcontractors, vendors, and other key stakeholders. Typically these reviews include recruiting and training operations staff and preparing for operational readiness review. We will develop a comprehensive Readiness Assessment Plan, which provides the foundation for a systematic review of every facet of the project including all of the supporting infrastructures for the Exchange Call Center. MAXIMUS best practice model, developed over

time, is comprised of three primary areas: Infrastructure, Human Capital, and Operations Readiness. The plan must verify the preparedness for cutover of staff, business processes, systems, data, integration points, facilities, systems infrastructure, technology networks, governance, reporting and communications. For the Exchange Call Center, we are also in tune with meeting federal requirements for the readiness, as we are currently undergoing this process in New York. We will bring this experience to bear on the Connecticut Exchange Call Center to proactively address CCHIO's concerns and requirements and lower risk for the Exchange. We will submit our completed Readiness Assessment Plan after contract award.

Infrastructure Readiness

In performing the Infrastructure Readiness Assessment, we use a checklist during the Readiness Assessment exercise that tests all the technical support elements of the project. As part of the readiness assessment process we conduct rigorous system testing in a tightly controlled and fully production-ready environment. [REDACTED]

[REDACTED]

Human Capital Readiness

A Readiness Assessment Plan and exercise would not be complete if it did not test the capabilities and processes required to maintain a staff of this size, as well as provide a plan for scaling the staff for future growth. This portion of the MAXIMUS Readiness Assessment Plan will help ensure the appropriate support areas are capable of scaling to the future. It will evaluate and test the areas that include, but are not limited to, the following:

[REDACTED]

[REDACTED]

Operations Readiness

The final section of the Readiness Assessment Plan gets to the heart of the operation – the day-to-day work. In this assessment, we test every path the business process may follow to help ensure we can handle not only the normal processing requirements, but also extraordinary situations. To illustrate, here is an example of how we assess one aspect of the call center's readiness:

[REDACTED]

Part of the call center readiness assessment will include making certain that CCRs have the appropriate level of knowledge, gauged by knowledge tests, observation, and role playing to accurately handle calls of varying scenarios that involve all potential components of Exchange Call Center services.

Readiness Assessments for Cross Organizational Boundaries

It is difficult to attest completely to the readiness of functions and technology outside of MAXIMUS control. In similar situations at other projects, MAXIMUS works through designated state contacts to develop an inter-organizational assessment team comprised of members from each vendor with responsibility. In a planned and scheduled timeline, we collaborate with the other vendors and the State to complete a cross-boundary readiness assessment. We anticipate a similar approach with the Exchange and other designated agencies and vendors in their roles on the Modernization for Client Services Delivery contract, including the ConneCT solution, and the System Integrator contract, including the Exchange portals for consumers and professionals, the eligibility system interfaces for IVR, CRM, and CCR access, and the re-enrollment process. We also anticipate coordinating with the Consumer Outreach and Engagement partner regarding branding and overall messaging.

Training for Readiness Assessment Exercises

MAXIMUS will assemble a team of Readiness Assessment Specialists, Disaster Recover/Business Continuity Specialists, and Training Curriculum Developers to develop an appropriate web-based training module for the readiness assessment exercise(s).

The focus of the training will be a review of the MAXIMUS Readiness Assessment Plan, instructions for the use of the Readiness Assessment Checklist, directions for conducting the exercise without interrupting day-to-day operations, and instructions for completing the after-exercise report and the communication plan. In addition, we document all completed training activities and house them in one central repository within our Learning Management System.

Tools Required In Support of Readiness Assessment Exercises

A successful exercise of the Readiness Assessment Plan requires certain support tools. The primary tool is the Readiness Assessment Checklist which also functions as an attachment to the Disaster Recovery/Business Continuity Plan. During the readiness assessment exercises, we will post any risks and/or issues to our risk and issue tracking log and then utilize the tracking mechanism we have put in place as part of a governance model to help ensure appropriate remediation, re-testing, and communication/reporting are accomplished.

Schedule of Readiness Assessments

MAXIMUS will provide an updated Readiness Assessment Plan during the Transition phase, developed in collaboration with the Exchange. As part of the plan, we will provide a suggested schedule for exercising each component of the Readiness Assessment review and resource allocation requirements.

Throughout the transition and interim period between the contract signing, the delivery of the Readiness Assessment Plan, exercising of the plan and "go live" date, a number of processes are likely to be fine-tuned and more clearly defined. Therefore, MAXIMUS proposes to update the assessment tool(s) and evaluate the changed areas when required.

The Readiness Assessment process will include all activities that must be completed successfully prior to the operational start date, including the readiness review activities to be completed prior to the operational start date.

Report of Readiness Assessment Findings

MAXIMUS initially tracks all findings on the Checklist, which records the initial pass/fail assessment with a comments section for items that do not pass. These findings and comments will be entered into our risk/issue management tracking system as issues or risks, as appropriate, in order to be tracked and provide progress reporting. A report will be provided to the Exchange following completion of the Readiness Assessment process. The report will identify problems uncovered and indicate how and when MAXIMUS will address and resolve the problems identified.

Remediation of Findings

[REDACTED]
[REDACTED]
[REDACTED] All issues will be addressed based upon proactively prepared contingencies.

Readiness Assessment Communications

[REDACTED]
[REDACTED] We will appropriately distribute communications routinely and timely to all concerned in order to successfully coordinate activities and agree on schedules, roles and responsibilities, and expected outcomes.

5.7.3.4.9 Acceptance procedures

Our acceptance procedure involves thorough participation, review, and final written approval by the Exchange for each area reviewed during the readiness assessment timeframe. We will collaborate with the Exchange and other key stakeholders to identify and finalize the acceptance criteria for readiness sign off of each major area reviewed. These acceptance criteria will become a part of the Readiness Assessment Plan.

5.7.3.5 Governance

RFP Section 4.4.7.5, page 23

We present our Transition Team in *Exhibit 5.7-4: Transition Team*. This experienced team will be responsible for handling all tasks associated with fully implementing the Exchange Call Center and reaching full operations on time. This team has the depth of experience needed for ensuring successful implementation and transition for this important transition to the Exchange's new model for the call center, and they will be instrumental in our successfully meeting the major milestones and deliverables within the timeline stipulated by the RFP.

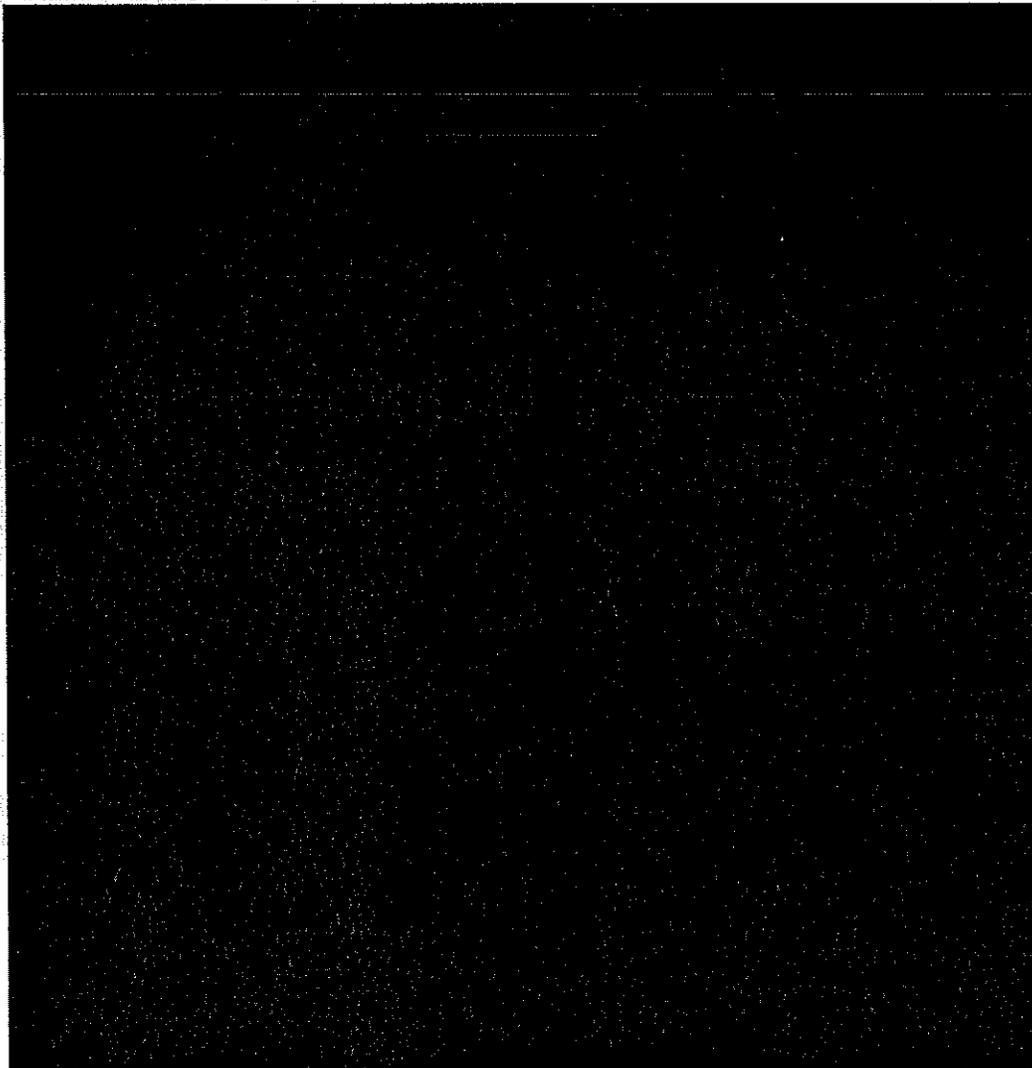
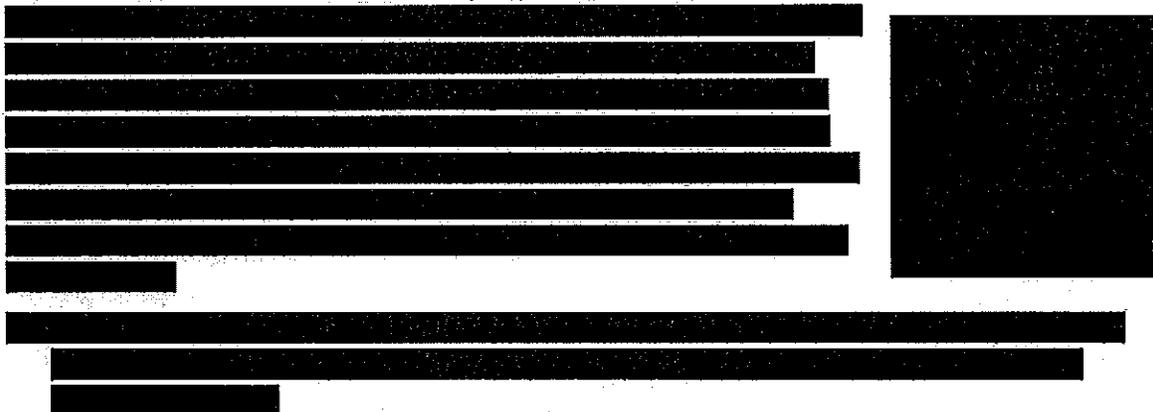


Exhibit 5.7-4: Transition Team. *Our dedicated and experienced team has worked on major project implementations in California, Colorado, Georgia, Indiana, Louisiana, New York, Massachusetts, Pennsylvania, Illinois and Virginia, among others. They are backed by corporate resources, vendor partners, and documented best practices shared by all MAXIMUS implementation teams.*



[REDACTED]

5.7.3.6 Steady State Metrics

RFP Section 4.4.7.6, page 23

Based on successful Readiness Review sign-off and completion of all Transition Phase tasks, the operations phase of the Exchange Call Center will begin. The first month – September 1 through September 30, 2013 – the call center will be "open for business", but only as an information source for consumers. Full operations will begin on October 1, 2013. At that time, the call center will be responsible for meeting the performance metrics and expectations as defined in the RFP, including:

- Answer 90 percent of calls within 30 seconds, 95 percent of calls within 45 seconds, and 99 percent of calls within 60 seconds over a measurement period of each day
- Maintain an average speed of answer of 20 seconds or less
- Meet the standard for the average time Call Center personnel spends on calls at least 65 percent of the time
- Maintain a weekly average wait or hold time not to exceed 120 seconds per call
- Maintain an abandon rate of less than five percent
- Achieve first call resolution for 85 percent of resolvable calls
- Achieve first call resolution for at least 65 percent of all calls
- Set a goal to achieve a consumer satisfaction rating of at least 90 percent

- Maintain an average handle time - talk time before a call is resolved, closed at Tier 1 or transferred to Tier 2 plus documentation time - goal of 9.5 minutes or less
- Maintain an average time spent by Call Center personnel off the phone - research, training, administrative work, etc. goal of 20 percent or less
- Ensure the weekly average number of incoming calls that are blocked (calls receiving a busy signal) will be no more than one percent

Our solutions design—including our [REDACTED], staff training, supervision and oversight, call monitoring techniques, reporting, and consistent attention to business process improvements—helps ensure that these metrics for performance will be met by the Exchange Call Center upon full operational status. We discuss these performance metrics in detail in *Section 5.5: Dedication to Quality*.

In addition to planning to meet performance metrics, we will develop call volumes and trending following the first open enrollment period that will help define our "steady state," affecting staffing levels and capacity planning.

5.7.4 Change Management

Appendix B References #226 – 232.

Our Change Management process is based on established best practices and industry standards, adapted to meet the needs of the Connecticut Exchange. Our major call centers, corporate office, and systems development teams all adhere to change management policies and procedures customized to meet their specific needs. With that understanding, we commit to actively participating in the Exchange's Change Management process in coordination with the State's System Integrator's process and other Connecticut initiatives as appropriate.

MAXIMUS has a highly structured process to implement, track, monitor, and document changes to software, systems, and services to safeguard against unauthorized modifications and to avoid change "collisions" and unexpected results. [REDACTED]

[REDACTED]

Transition Success Story

Unexpected Call Volumes

[REDACTED]

[REDACTED]

MAXIMUS will seek pre-approval from the Exchange for any standard changes to Call Center services that pose a potential risk to fulfilling our consumer support responsibilities or to Exchange consumers. We summarize our overall approach in *Exhibit 5.7-5: Connecticut Exchange Call Center Change Management Process*. MAXIMUS uses a documented and standardized approach involving all key stakeholders.

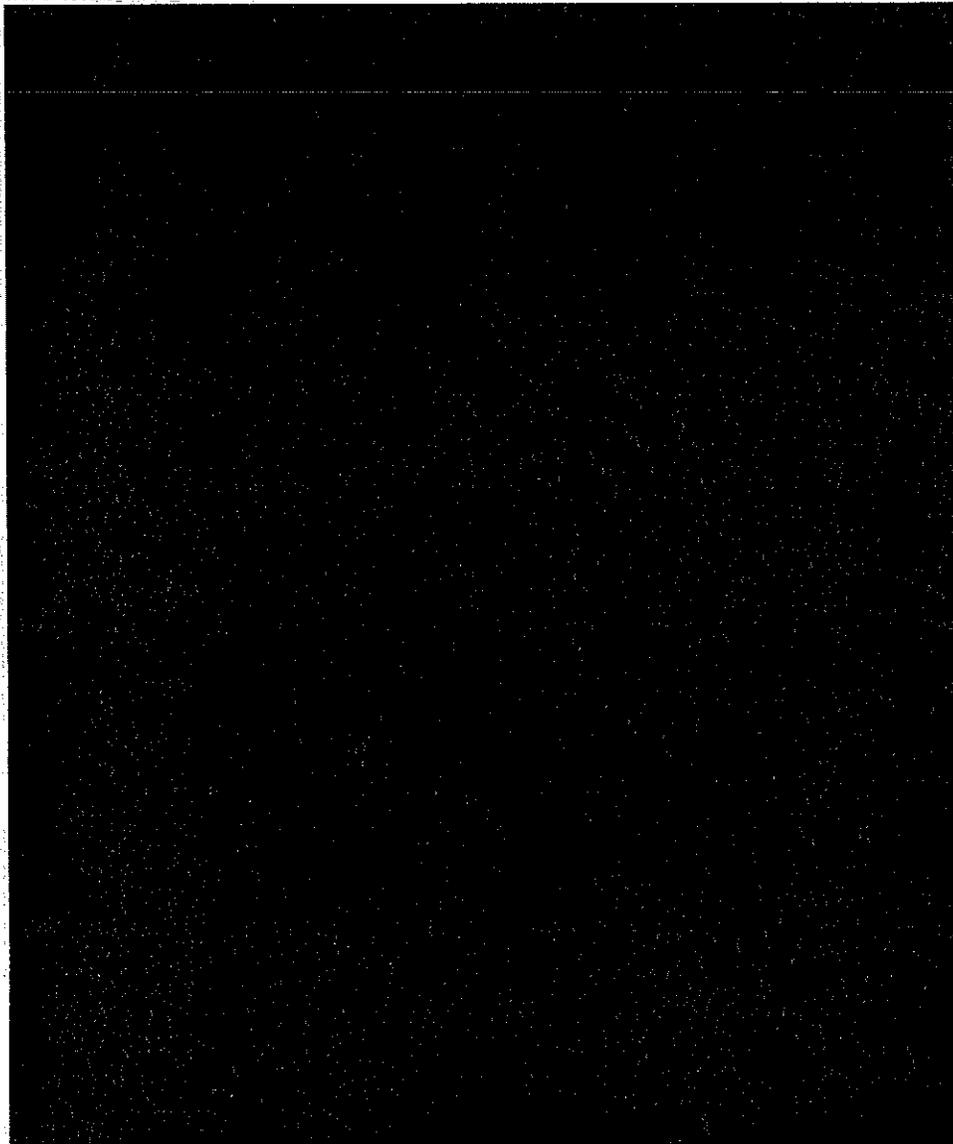


Exhibit 5.7-5: Connecticut Exchange Call Center Change Management Process. *Our process helps ensure that all stakeholders are aware of changes and understand the impacts to operations so that the Exchange Call Center can avoid unexpected changes.*

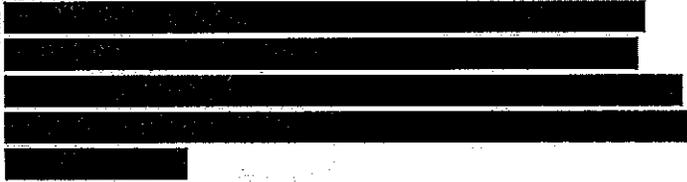
MAXIMUS agrees to refrain from scheduling routine system maintenance, repair, or upgrade activities during hours that could compromise or disrupt critical call center operations. Instead, we propose agreeing upon a regular maintenance window to accommodate routine activities. Should critical or emergency maintenance be required outside this maintenance window, we will obtain prior approval from the Exchange. If it is not possible for us to obtain prior approval, we will document and report emergency changes to the IEPMO in a timely manner.

It is important to note that especially during the earlier stages of operations, we may agree upon an expedited process for review and approval of changes. We will rely on the Exchange for guidance.

5.7.5 Impact Analysis, Risk Management, and Risk Assessments

Appendix B References #236 and 237

Part of our best practices pertaining to project start-up and implementation includes developing a Risk Management plan for identifying and assessing risks, and mitigating their potential impact on the project transition. Project transitions are a particularly vulnerable time, and we have learned through our many project transitions that identifying the task dependencies and critical path in our Work Plan, coupled with an aggressive risk mitigation strategy helps us stay on schedule, track resource allocation, and maintain progress toward completion. We will submit our Impact Analysis and Risk Management plan during the transition phase of the Exchange Call Center in expectation of input, review, and approval from the Exchange.



As we customize it to fit the specifics of the Connecticut operation, we will use our risk management process to identify and track risks, develop risk mitigation and contingency plans as part of risk handling, monitor risks, and perform risk assessments to determine how risks change during the course of the project.



Exhibit 5.7-6: Risk Management Plan Table of Contents. *The topics we cover in our Risk Management Plan for the Exchange Call Center will fully identify potential risks, mitigation strategies, and contingency plans.*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

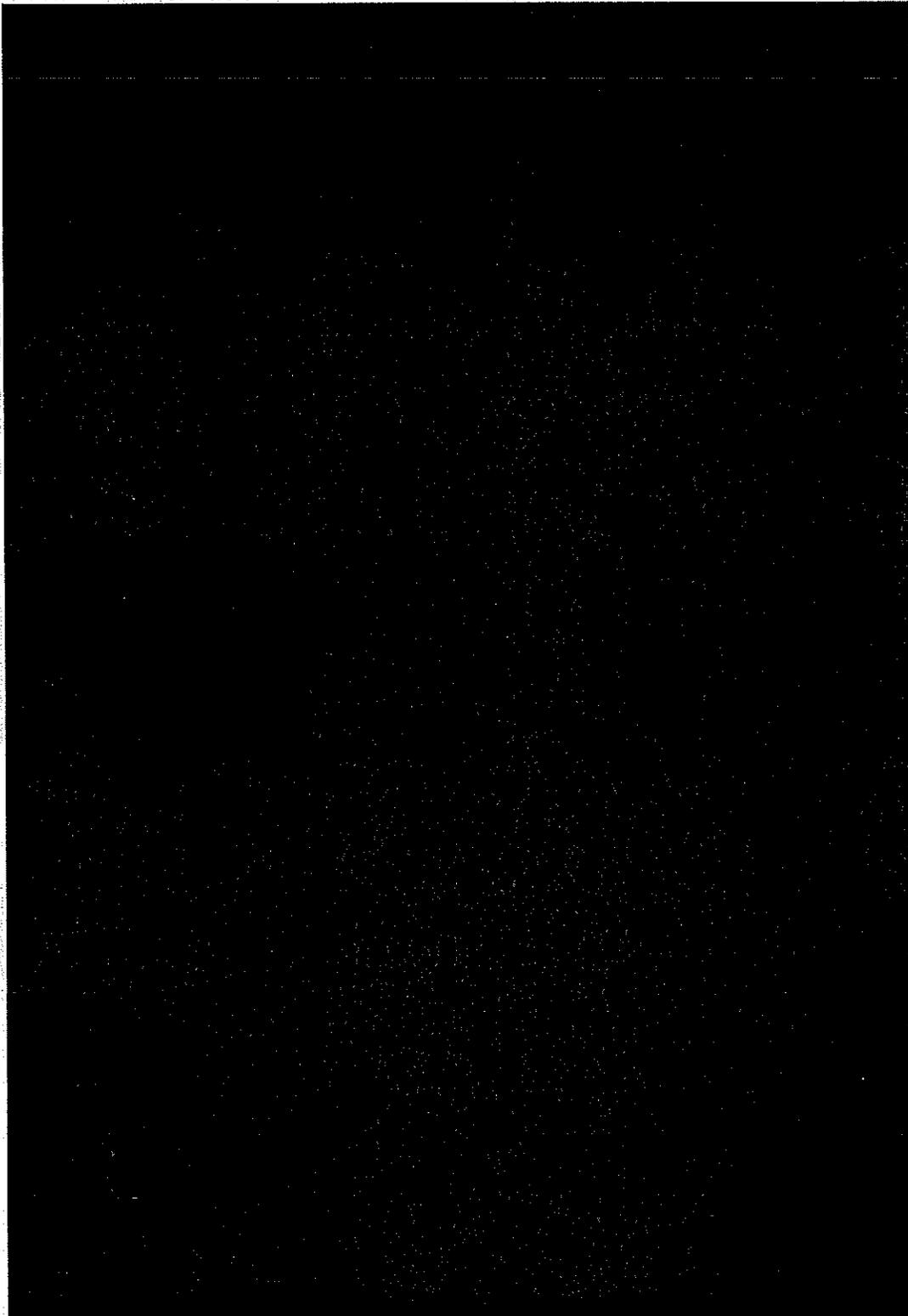


Exhibit 5.7-7: Risk Management Process. *We have established risk management identification and analysis processes in place to help ensure a successful transition for the Exchange Call Center.*

The Transition phase for any project presents special challenges due to the dynamic nature of implementing facilities, systems, telephony, and staffing solutions. For the Exchange Call Center, we present the lowest possible risk associated with facilities and staffing because we will leverage existing operational facilities and telephony, as well as trained, dedicated staff with experience in Exchange Call Center operations and planning.

Some of the potential risks often associated with Transition are described in *Exhibit 5.7-8: Transition Risk and Mitigation*.

Potential Transition Phase Risk	MAXIMUS Risk Mitigation Strategies
[REDACTED]	[REDACTED]

Exhibit 5.7-8: Transition Phase Risks and Mitigation. *Our experience transitioning similar projects has prepared us to virtually eliminate transition risks for the Exchange Call Center with careful planning, experienced leadership, corporate strength, and proven technology.*

We will participate with the Exchange in Risk Assessment activities associated with the Call Center Exchange Consumer Support function at your direction.

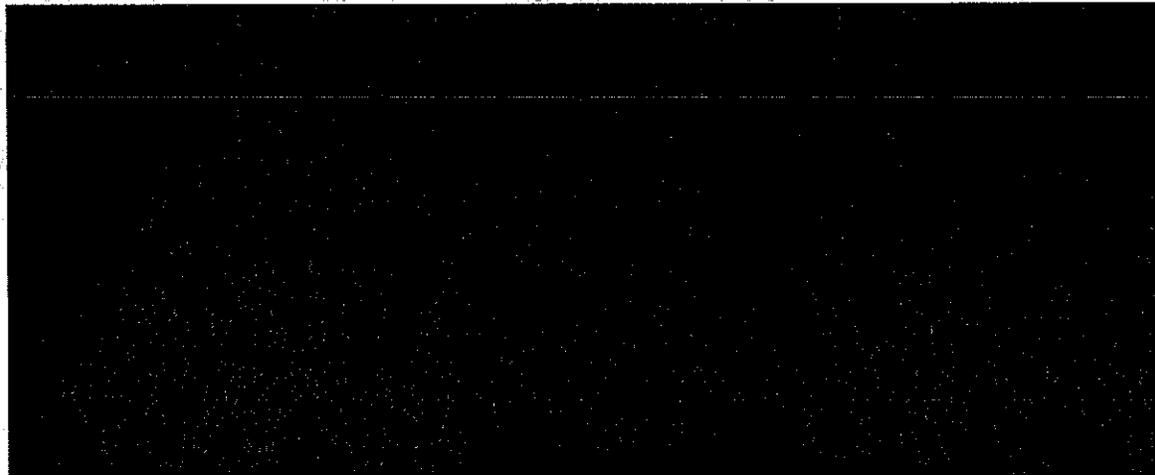


Exhibit 5.8-1: Training Plan Development Approach. *We are committed to providing a high quality training program that is aligned with the Exchange's objectives.*

We have carefully reviewed the Appendix B: Requirements Traceability Matrix and provide an overview of our approach to achieving the stated training and development objectives in the following subsections: *5.8.1: Employing and Developing Qualified Personnel through 5.8.5 Training Evaluation and Verification Process.* While substantial additional input from the Exchange will be required post contract award, we have taken every possible step to be prepared to plan, construct, and deliver a superlative training program that will help ensure that all personnel have the knowledge and skills to execute their duties in an accurate, timely, and customer-responsive manner.

Training for the Affordable Care Act

MAXIMUS has invested years in the analysis of ACA with an emphasis on the eligibility and enrollment provisions, providing a strong foundation for operating the Exchange Call Center. Among these provisions are the requirements related to insurance affordability programs including State-based Exchanges (SBEs), State-operated Small Business Health Options Programs (SHOPs), and the related consumer support programs and functions. Through our industry-leading position serving Medicaid and Children's Health Insurance Program (CHIP) participants, as well as our work with the commercial insurance market through Pre-existing Condition Insurance Plan (PCIP) projects, we have provided input into the ongoing preparation and mapping for Exchange Call Center.

While the existing guidance offers an initial blueprint for these marketplace options and the related eligibility and enrollment support services, we also anticipate that the provisions and federal rules will continue to evolve during the implementation and ongoing operation of the Connecticut Health Insurance Exchange Call Center. Similarly, we anticipate program and business process changes as a result of the implementation of the Modernization of Client Service Delivery initiative, the Integrated Eligibility System, and the Health Insurance Exchange Portal. We are ready to respond with a flexible training program that will produce a highly qualified workforce to serve the State of Connecticut with excellence, empathy, and vigilant attention to consumer satisfaction.

Training Approach

MAXIMUS has established a substantial team of experts in instructional design and adult education. We have developed training programs for personnel in more than 60 government health and human services

contact centers, including 27 Medicaid and CHIP specific projects as well as other call centers serving the commercial health insurance market. The training approach we offer today represents the expertise gained from more than 20 years of relevant experience operating large-scale customer service call centers. MAXIMUS has finely tuned our training methodology from lessons learned about the techniques and processes that have proven most effective and will apply this expertise to our plan for the Exchange Call Center. We present some of the significant features and benefits of our approach in *Exhibit 5.8-2: MAXIMUS Instructional Design-Based Training Solution.*

Key Elements of Instructional Design	Benefits of Our Training Approach
[REDACTED]	[REDACTED]

Exhibit 5.8-2: MAXIMUS Instructional Design-Based Training Solution. *Our instructional designers work with subject matter experts to make certain that we base training on established best practices and use an approach that features the elements most critical to successful training delivery.*

[REDACTED]

[REDACTED] We will look to subject matter experts and established best practices from across our organization to support the Exchange Call Center training team during all phases of operation—initial transition, implementation, and ongoing performance.

We also have the full backing of the MAXIMUS Center for Employee Development (CED) providing oversight for enterprise-wide professional development. The CED delivers support for training teams and supervisors by developing core business curricula and fostering collaboration among project training teams. The CED areas of focus include:

- Core business skills: time management, professionalism, problem solving, business writing, presentations, communications, desktop technology, MAXIMUS systems
- People management: supervisory skills, performance management, teamwork, coaching and mentoring, leadership
- Ethics and compliance: business ethics, workplace conduct, information security, and Health Insurance Portability and Accountability Act (HIPAA) guidelines
- Project management: scope, contracts, financials, quality, risk, and communications management

The CED provides an online training curriculum that includes both mandatory compliance training that all employees must take on an annual basis as well as voluntary training geared to the wide variety of professional development needs of our staff.

5.8.1 Employing and Developing Qualified Personnel

Appendix B References #103 - 107

[REDACTED]

[REDACTED] Our comprehensive talent acquisition and development approach reflects our philosophy of performance readiness. We make sure we have the right people thoroughly trained and tested on time, in the applicable content, in order to deliver customer service excellence. We rely on carefully designed, validated, role-specific job descriptions to identify those job candidates who have the competencies and personal qualities that will make them the most likely to succeed in their positions. In addition, we require candidates to demonstrate required skill proficiency such as customer service or data entry. Once we hire an employee, we support them with a comprehensive training program that prepares them for their new role—and whatever roles they aspire to in the future [REDACTED]

We complement our automated capabilities with a personal approach to consumer assistance, training staff to respond to real-life scenarios and targeting the steps in the application and enrollment process that prove most challenging for customers.

[REDACTED]

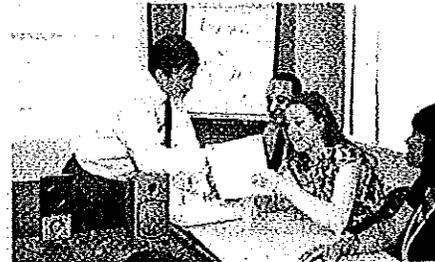
MAXIMUS will deliver training to prepare CCRs and Brokers to provide consistent, accessible, and responsive assistance to support and empower personal decision-making and appropriate action for those

seeking Exchange services. This includes help for individuals, families, employers, and employees, as well as navigators, brokers, and other callers to the Exchange. The training and monitoring we conduct on interpersonal skills and listening will emphasize the importance of understanding the individual circumstances of each customer contact and the adherence to current regulations, policy, procedures, and service guidelines for handling Exchange customer interactions. The supporting resources and tools we provide to our staff, such as the knowledge database and the learning management system, will also be critical components in rapidly responding to consumer needs and program changes while making certain that we provide current and correct information with seamless service. Developed with solid guidance and direction from our Exchange partners, our Training Plan for Call Center staff will make certain that our personnel meet the following requirements stated in Appendix B.

- **Understanding the Exchange's technology and sourcing arrangements** through the business process outsourcing relationships between the Exchange and MAXIMUS, including any defined and agreed upon transfer and escalation procedures. We will engage DSS, through facilitation by the Exchange, to address interactions related to the ConneCT client service modernization project that include the integration between the DSS Benefit Center and its IVR and the Exchange Call Center. Training will also cover the Exchange Portal and the relevant consumer assistance and service integration components of the Integrated Eligibility (IE) System, as well as handling of Exchange-related insurance affordability program options and functions including Advance Premium Tax Credits (APTC), Cost-Sharing Reductions (CSR), Qualified Health Plan enrollment, and applying the Modified Adjusted Gross Income (MAGI) definition for eligibility determinations.

- **Monitoring requests and events designed to meet the Exchange, vendor, and end-consumer requirements**

[REDACTED]



We tie our training to quality assurance, combining accountability, business process management, and analytical tools to monitor and improve the performance of Call Center Representatives.

- **Training on new products and services, as they become part of MAXIMUS responsibilities** or resulting from solution or program changes will be developed by our training team through close collaboration with the Exchange as described in the following *Section 5.8.2: Training Responsive to Solution and Program Changes*. With our flexible and scalable knowledge and learning management systems and an experienced training team, we are easily able to take on new initiatives with little or no adverse impact to our existing business processes and systems.
- **Continuously training and monitoring staff in order to evaluate/correct quality and service-related issues** – recognizing that appraisal is an integral part of the training process, MAXIMUS will regularly perform in-class assessment, testing, and evaluation to validate learning and the effective

application of knowledge. This immediate feedback provides the training team with tools to target remedial needs and implement training that is necessary before releasing an employee to the production environment.

Improving Instruction through Ties with Quality Assurance

To further support and measure our success, MAXIMUS ties our training to quality assurance (QA), combining accountability, business process management, and analytical tools to monitor and improve CCR performance. We assess CCRs for accuracy, reliability, and achievement of contractual requirements and corporate standards. We consider participant results, instructor assessments, job performance, and QA and supervisor evaluations, and tie these findings back to integrated QA and training process improvement.

To inform and improve instruction, our training team will regularly participate in project management meetings and work closely with Quality and Reporting staff to identify and address indicated areas with opportunity for improvement. This shared team approach serves as a valuable resource in identifying training needs and creating appropriate action plans for refresher or remedial training. These determinations may result in individual action plans, changes to existing training, new targeted training to improve service and quality, or the development of job aids or reference materials to improve efficiencies.

Our collaborative team approach enables us to close performance gaps before they escalate into more serious quality issues. We can develop targeted training sessions based upon trends in QA reports (identified through regular QA reviews and audits), or when observations reported by supervisors indicate a need. We will also develop refresher training to respond to Exchange or project changes in policy or procedure. We will conduct additional refresher training on a regularly scheduled basis. For example, we ask staff to take refresher classes and pass applicable tests as part of our corporate-wide annual compliance training.

5.8.2 Training Responsive to Solution and Program Changes

Appendix B References #108

Almost all of our government health care program call centers have experienced policy and program changes. Our training procedures are dynamic, responsive, and flexible to adapt easily to changes in Exchange Call Center policies, regulations, and other evolving program needs. We train Call Center personnel on solution and program changes and prepare them to provide applicable consumer support before such changes go into effect. [REDACTED]

MAXIMUS training procedures are dynamic, responsive, and flexible to adapt easily to changes in Connecticut Exchange Call Center policies, regulations and other evolving program needs.

[REDACTED]

We have demonstrated the capability to rapidly adjust and advance our training to meet the demands of program modifications in our long-standing MAXIMUS health and human services projects across the

country. Our training plans are scalable and adaptable to respond to evolving program initiatives without requiring new systems or sizeable staff increases. [REDACTED]

The MAXIMUS training program for the Call Center will identify changing needs, integrate collective input, continuously evolve, measure its own effectiveness, and ultimately support the ongoing mission of the Exchange. We will build our training strategy on the Exchange's goals to create an easy, simple consumer experience and provide empathetic and responsive service for individuals, families, and small employers seeking affordable health insurance options in Connecticut.

5.8.3 Trained and Knowledgeable Personnel

Appendix B References #109 – 112

MAXIMUS will develop call center professionals capable of performing required job responsibilities and diverse staff functions. We will train our personnel to help Exchange members develop the knowledge and skills they need to obtain coverage and access the health care system appropriately. MAXIMUS will prepare staff to assess the needs of callers to provide immediate assistance or direct consumers to other appropriate support programs and resources such as the Connecticut Insurance Department (CID), Office of the Healthcare Advocate (OHA) and the Department of Social Services (DSS) Benefits Center and other community resources. We will work with our Exchange partners to clearly define service parameters and develop specific referral guidelines to support a collaborative and smooth consumer assistance experience. We also emphasize the handoffs needed between the CCRs and Brokers—when they should occur and how they should be carried out.



Our model of training links the learning of a policy with its associated business practices and systems in a dynamic and interactive way to enhance learning and retention.

We have provided training specific to Exchange functions such as: eligibility, enrollment, income verification, subsidy determination, health plan requirements and coverage types, as well as benefits and services. The business rules and eligibility criteria among insurance programs have both clear-cut and subtle differences. Exchange CCRs must know and understand the distinctions, as they will be explaining these differences to applicants and those enrolled. For example, we design eligibility training with a given case's life cycle in mind. The flow of the training follows that life cycle, from consumer inquiry to application and eligibility determination to health insurance plan enrollment to re-enrollment processing.

Our performance-based Training Plan will cover elements specific to public and commercial insurance programs, health plan options including product costs and benefits, and the procedures and interactions necessary for enrollment in the Exchange. We focus not only on knowledge acquisition but also on the application of that knowledge to a specific business context. We link the learning of policy with its associated business practices and systems in a dynamic and interactive way to enhance learning and retention.

MAXIMUS personnel also learn to be practically aware of the diverse cultural, linguistic, economic, educational, and health status needs of callers and remain sensitive to each individual's situation. In addition to standard scripts, we prepare our staff members to have guided conversations with callers. We train CCRs to ask clarifying questions to confirm caller comprehension and ability to act upon the information provided. Our call center training program fully prepares staff to deliver:

- Effective customer contacts and communication
- Exemplary, customer-focused service to resolve inquiries at first contact
- Accurate eligibility and enrollment information and guidance
- Empathetic service with respect for diverse consumer needs
- Confidential handling of consumer information
- High levels of quality and efficiency in job performance

[REDACTED]

While we expect the Brokers to have detailed knowledge of the health insurance marketplace, we plan to supplement this knowledge with a greater understanding of the purpose of the Exchange, the consumers being served, and the role-based requirements the brokers are expected to follow. Our training will address the availability of health plans and their distinguishing characteristics, the functionality of provider directories and provider search capabilities, and the types of questions asked or assistance sought by those who need to make decisions affecting their enrollment.

Compliance with State and ACA Rules

Along with the Exchange, MAXIMUS will work together with DSS, Brokers, and other stakeholders to support compliance with the State and ACA laws and to help individuals, families, employers, employees, and others understand the new rules and benefits. We will focus on offering assistance and guidance to consumers and others that are attempting to learn and come into compliance with the new rules. This approach includes imparting knowledge of coverage options, transition provisions, open and

special enrollment periods, and other policies in place to help ensure that the new rules take effect smoothly and with minimal disruption to consumers as well as existing plans and practices.

However, mindful of the complicated nature of ACA implementation, MAXIMUS will train our personnel to recognize and understand comments by consumers and other callers that might imply potential State and ACA rule violations and instruct them on case handling procedures approved by the Exchange and documented in our knowledge database.

In all of our projects, MAXIMUS complies with state and federal requirements regarding health insurance programs and the detection and reporting of rule violations or fraudulent activity. [REDACTED]

[REDACTED] We will require Call Center personnel to sign a Fraud Awareness and Reporting Policy Acknowledgement Form and participate in ethics training as part of their New Hire orientation and annually, thereafter, to indicate knowledge of and agreement with requirements.



To prevent a conflict of interest, MAXIMUS policy prohibits employees from working on any aspect of a case or application that includes them, their family, or friends as a case member.

MAXIMUS employees who violate this policy, including failing to report a potential violation, may be subject to a disciplinary process, up to and including termination. Our Exchange Call Center policy will cover opportunities where fraudulent activity may be identified including: suspected consumer fraud or rule violations reported by callers; unusual caller or consumer activity detected by CCRs; and activity by employees, temporary staff members, or consultants that is potentially fraudulent. We will require staff members who become aware of unusual activity or potential rule violations to report this to their immediate supervisors. Supervisors will report the activity to the Quality Assurance and Training Manager. If the report demonstrates any activity matching criteria established with the Exchange as requiring notification, the Quality Assurance and Training Manager will complete a

report that includes the details of the activity and submit this immediately to designated contacts at the Exchange.

As a standard practice, MAXIMUS policy prohibits employees from working on any aspect of a case (for any program) or application that includes them, their family, or friends as a case member. This activity presents a conflict of interest and we reassign the case accordingly. In the event that an employee, during the normal course of business, encounters their own case information, or one involving a family member or friend, they are required to forward that task back to their business unit or supervisor immediately. We also prohibit employees from using any consumer information for any reason outside of that required for approved operational processes.

In the case of suspected internal fraud, we require employees to report this to the Quality Assurance and Training Manager or to the MAXIMUS Ethics Hotline (with the option of anonymous reporting). The MAXIMUS Compliance Officer will investigate ethics violations reported through the hotline. The corporate Compliance Officer and/or the MAXIMUS Chief Privacy Officer will also report violations to the Exchange at your direction and according to Federal and state law and HIPAA regulations.

Exchange Governance Team Training

On an annual basis and upon request, MAXIMUS will recommend and deliver training to the Exchange's governance team covering specific topics and content relevant to the team's leadership and oversight role. We will provide training sessions for the governance team that include pertinent knowledge database resources, operational components, service information, and other key takeaways gleaned from our ongoing experience serving Exchange Call Center customers and discuss how they contribute to the overall Exchange consumer experience goals. We will coordinate all training scheduled with the Exchange and provide these knowledge transfer sessions in formats and at times most convenient to the governance team. Options include small group discussion and in-person training, hands-on activities and live demonstrations, web conferencing or web-based training, written materials, individual assistance, and other modes upon request.

MAXIMUS will provide an audience-appropriate curriculum based on the distinct and unique needs identified for the Exchange governance team and will ascertain the best subject matter and delivery methods to support the team's full participation with Call Center operations. Training may cover information technology and telecommunication systems, business operations/workflows, general policy and standard operating procedures, monitoring and reporting activities, and other program and service related topics as directed by the Exchange.

Training to Protect Consumer Information

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5.8.4 Training Content and Delivery

Appendix B References #113 - 117

The MAXIMUS training team looks forward to close collaboration with the Exchange Team to further refine and delineate our approach to Call Center training and development. This includes the modes, methodologies, settings, specific skill sets and knowledge required for each job role, designated training personnel, and measures to verify achievement of training objectives. We are committed to offering a comprehensive Call Center training program that meets the Exchange's service requirements related to the health care industry and Health Insurance Exchange. Our training program will enable personnel to acquire and maintain the knowledge and skills necessary to address the needs of internal and external stakeholders—specifically those pertaining to the Exchange including public and commercial insurance programs, health plans, medical providers, brokers, navigators, employers, individuals, and families.

Our training approach begins with a strong initial Training Plan created for start-up, extends to new hire training during implementation, and continues with ongoing training and professional development once the Call Center fully becomes operational. Our Training Plan is a living document. We identify requirements for new or refresher training internally through job analysis, trainee testing, quality audits, and study of job performance outcomes. External inputs to our Training Plan include guidance or evaluations from the Exchange, attendance at outside training and conferences, and cross-fertilization of training ideas across our company as facilitated by the corporate CED. In addition to remedial or new coursework, we require staff to complete annual compliance refresher training.

We divide our curriculum into general training programs for initial new hire, refresher, and ongoing training and professional development. MAXIMUS will prepare and submit our formal Call Center training curriculum for Exchange input and review, with implementation occurring upon your approval. Our training program for Call Center staff includes:

- New Hire Training – with a focus on orientation to Call Center services and required subject matter that enables a staff member to rapidly assume his/her position in a productive and efficient manner
- Refresher Training – to address periodic and ad hoc program, process, and policy changes and regularly revisit key topic areas to maintain competency levels and to meet job performance and compliance requirements
- Ongoing Training – to address planned policy, process, or technology changes, maintain optimal skill levels, and provide frequent opportunities for professional development and growth

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Training prepares staff to work effectively with customers from a variety of backgrounds with unique cultural, language, ethnic, physical and emotional needs.

[REDACTED]

It is critical that our staff provides prompt and courteous service, answers all questions accurately, offers easy to understand explanations of program and health insurance requirements, and above all, is culturally competent and linguistically appropriate. Our training program makes certain that our staff is able to work effectively with individuals from a variety of backgrounds. Staff must be comfortable working with customers who have unique cultural, language, ethnic, physical, and emotional needs. We hire only individuals who meet this qualification. Furthermore, during our three-hour initial cultural sensitivity training module—which covers community diversity and how to interact with individuals from different

ethnic, religious, and socioeconomic backgrounds—we train our staff to treat every caller with dignity and respect, preserve confidentiality, and accommodate cultural and linguistic differences. We base this module upon a proven training program that we use throughout the country in our health and human services call center projects. It will serve as a foundation for supporting the highest levels of sensitivity and respect for the varied backgrounds of Exchange customers.

Staff will also learn to interact appropriately with small business employers and employees, Navigators, and other entities using the SHOP and Individual Exchange. We train and equip staff with skills to differentiate the needs and types of inquiries of the various customers encountered.

MAXIMUS builds our training curriculum on a strong foundation of existing resources, including call center policies and procedures, desk guides, and work instructions from our repository of curricula honed and enhanced over more than 20 years of training delivery for health services operations. Our curriculum conveys the policies driving our work, the procedures and protocols for providing excellent customer service, the standards and framework for conducting daily operations, the systems and equipment enabling us to serve consumers, and our emphasis on respect and privacy governing each interaction with customers and one another.

Training Modes and Methodologies

Our training provides the skills and knowledge needed for each specific job role. Training makes staff aware of the materials, tools, online resources, and systems in place to enable them to handle their daily responsibilities as well as manage ongoing program changes that may affect the resolution of consumer inquiries. We deliver our program in the most effective manner to develop the capabilities of our personnel and teach them the intricacies of our systems and solution using a nested approach that culminates in new hire and continual employment readiness as shown in *Exhibit 5.8-4: MAXIMUS Training Strategy*.



Exhibit 5.8-4: MAXIMUS Training Strategy. Our multi-layered approach incorporates role-based analysis, a blend of training methods, supportive resources, and ongoing assessment to deliver a flexible and responsive Call Center training program.

[Redacted text block]

[REDACTED]

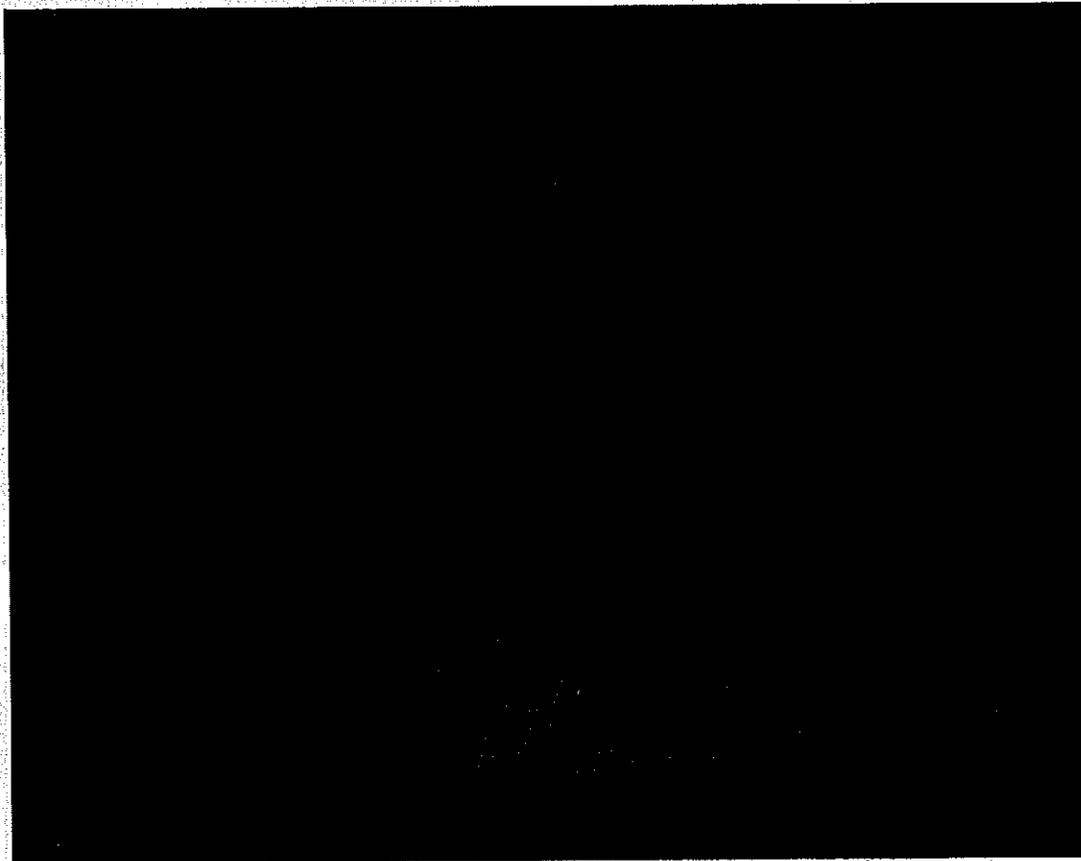


Exhibit 5.8-5: MAXIMUS Comprehensive Training Strategy. *Our training strategy incorporates audience analysis, a blend of training materials, and numerous resources to deliver an effective training program.*

[REDACTED]

[REDACTED]

Using sophisticated principles of learning—blended, active, and integrative—we have created a highly effective and efficient model of new hire training that produces the desired levels of skills and knowledge gain, and retention of these gains, while reducing training duration. This training model features a hybrid approach that combines active learning that simulates the conditions of the workplace with learning performed in the actual work site.

We use frequent and periodic in-class assessments and evaluations, which add more emphasis to the learning process and help to detect shortfalls in student learning in a timely manner. This immediate feedback allows the instructor to apply additional training to remedy these identified shortfalls directly.

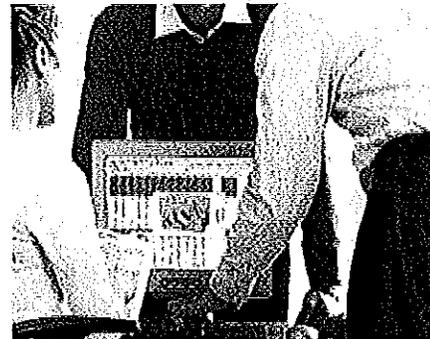
Training Team Approach - Train the Trainer (T3)

[REDACTED]

5.8.5 Training Evaluation and Verification Process

Appendix B References #118 – 123

MAXIMUS will develop, implement, and maintain a formal training evaluation and skill set verification process for Exchange Call Center staff. The process will incorporate competency testing with objective performance thresholds linked to minimum requirements and documented in our learning management system. It will also include job performance assessments, supervisor and QA evaluations, and the implementation of indicated training action plans for Call Center personnel. Training certification assesses a staff person's qualifications to work in the live production environment. Certification also supports ongoing maintenance of knowledge and skills. Personnel must exhibit specific skills and proficiencies to 'pass' the live performance assessments as determined by the training team. For example, we will use system simulations to test and observe the aptitude and capability of staff with applicable systems and technology tools to support proficient job performance. Staff will also participate in annual testing and re-verification of identified knowledge and skills on an annual basis and following changes in specific programs, procedures, and systems.



Tenured staff members and supervisors provide daily feedback and coaching while new staff members shadow them.

Through the learning management system, we will track instructor-led and web-based training completion, testing, and certification results. MAXIMUS welcomes Exchange review, approval, and ongoing evaluation of our training verification and certification plan. Features of our learning management system include:

- Ability to create customized course catalogues with search capability
- Management of classroom-based instruction and e-learning training curriculum
- Assignment of required courses, prerequisites, and due dates
- Automated tracking of registration, enrollment, training history, and verified certification
- Flexible reporting for detailed course tracking and performance data

Training undergoes continuous evaluation and improvement with information sharing across MAXIMUS projects and expert resources in place to integrate practice-based enhancements to improve performance.

The learning management system produces training reports for audit purposes that identify the number of personnel trained and certified to perform specific job tasks as defined in our scope of work, including tests, scores, and dates completed.

[REDACTED]

Once new staff members complete classroom training, they transition to OJT. During the OJT period, we pair staff members with tenured staff and supervisors who evaluate the student's ability to provide accurate program information and quality customer service. The tenured staff members and supervisors provide daily feedback and coaching while the new staff member shadows them. Once the new staff member has demonstrated a basic knowledge of programs, we gradually transition them to hands-on training while being continuously monitored by a tenured staff member or supervisor.

[REDACTED]

Post-training evaluation makes certain that we have a sufficient number of well-trained Call Center staff to meet or exceed the requirements of our contract:

- Staff members are evaluated on basic job functions and activities
- Personnel have access to OJT supervisors in addition to training and QA staff for assistance
- Employees are paired with a tenured staff member or supervisor to evaluate their ability to provide accurate program information and quality customer service
- Individuals who do not initially meet the requirements receive additional training and coaching before they are released to the production floor

5.9 Disaster Recovery/Business Continuity Capabilities

RFP Section 4.4.9, page 24; Appendix B References #47 – 50, References #223 – 224, References #239 – 258

Throughout our 37 years of "Helping Government Serve the People[®]," we have learned that disasters of all types and levels of severity can impact a project's operations, and the most important tool our projects have to help ensure that a disaster does not permanently disrupt operations is a plan that is dynamic enough to anticipate and respond to potential risks to operations and specific enough to enable project personnel to act quickly and decisively in the face of a myriad of circumstances. We intend to develop such a plan for the Exchange Call Center, drawing upon industry best practices, established Disaster Recovery/Business Continuity (DR/BC) Plans, and real-life experiences. We will work with the Exchange to finalize our plan following contract award, and will submit the final plan during the transition period.

Comprehensive planning for responding to disasters and emergencies is not optional for our health and human services projects. Our corporate commitment to continuing to provide high quality, consistent services is evidenced by the redundancy in our technology design, resiliency in our configurations, and by leveraging our considerable infrastructure and resources.



MAXIMUS has the expertise, experience, and commitment to provide a comprehensive DR/BC Plan that addresses the Exchange's concerns and requirements for the Call Center, including providing continuous operations. In this section we describe our corporate methodology for developing, testing, and maintaining our DR/BC Plan, which will incorporate the Exchange's involvement at all levels, as well as some disaster prevention strategies we find important. We follow that with information specific to the Exchange Call Center contract, including pricing impacts.

5.9.1 Plan Development

Appendix B References #243, 248 – 249, 258

Our DR/BC Plan creation methodology begins with the standard corporate plan for DR/BC, which we tailor to specific Exchange Call Center needs and risks. Designated Exchange staff members are encouraged to become involved in this process with us early on in order to help ensure that Exchange corporate standards and service level expectations are a part of our planning process. In addition, we will work closely to develop a future state DR/BC Plan with the Exchange.

The DR/BC Plan minimizes risks by combining thorough planning with an analysis of mission-critical business processes and requirements. This methodology has been used in formulating DR/BC plans for our health and human services projects, providing the strategies to support critical business functions and recovery following a declaration of a disaster, as summarized in *Exhibit 5.9-1: Disaster Recovery Planning Methodology*.

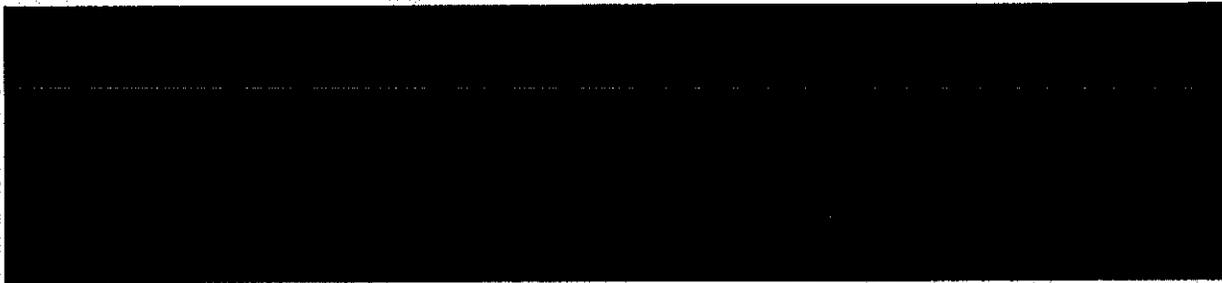


Exhibit 5.9-1: Disaster Recovery Planning Methodology. *Our methodology is based on an industry-standard approach, providing the Exchange a realistic method to develop a comprehensive plan for continuity of operations and recovery following disaster.*

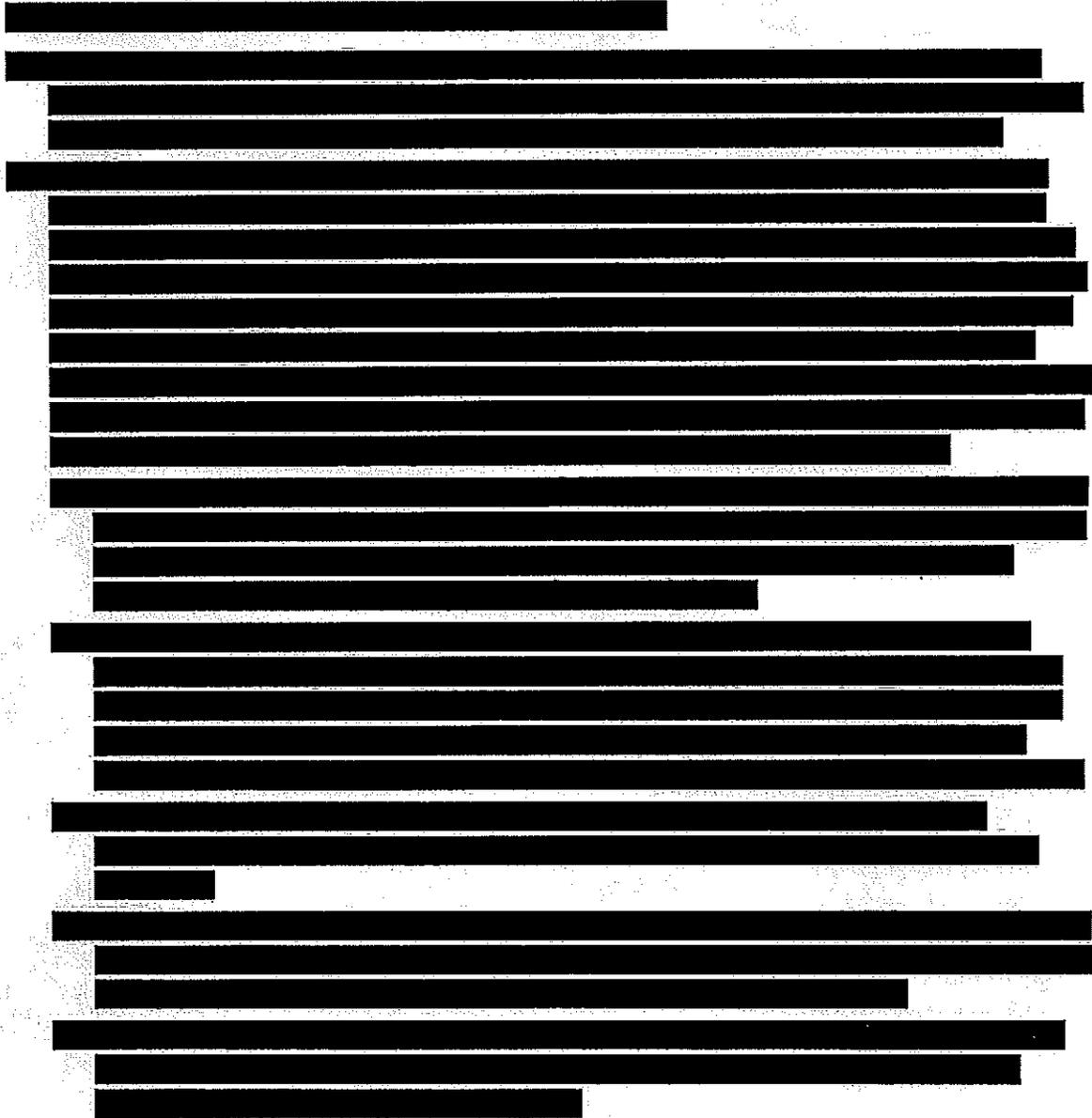




Exhibit 5.9-2: Risk Assessment Model. *By carefully analyzing risk, we can build comprehensive risk mitigation strategies to prevent disastrous situations when possible and respond and recover quickly when unavoidable.*

[Redacted text block containing multiple paragraphs of obscured content]

[REDACTED]

Real-life scenario

East Coast Earthquake

[REDACTED]

5.9.2 Testing and Auditing the Plan

Appendix B References #244, 251 – 252, 255 – 256

No DR/BC Plan can remain effective unless we test it at least annually. Typically, our DR/BC Plan testing involves periodic exercises developed to demonstrate how we can recover from defined categories of failure. We recommend that initial testing of the plan take place following the completion of the Transition phase—ideally at least six months into the operations phase. This allows time for project processes and functions to fully evolve into their steady state. The DR/BC Plan will be tested against previously defined and agreed-upon DR Service Levels.

[REDACTED]

[REDACTED]

Real-life scenario

New York Blizzard

[REDACTED]

As we finalize the DR/BC Plan, we will work closely with the Exchange to determine the magnitude of testing required and the level of involvement desired. We encourage and expect the Exchange and other key agencies to participate in executing the test plans and providing feedback on test results.

We will participate in post-test meetings with the Exchange to thoroughly review the testing activities and analyze what worked as planned and what did not. Any area identified as deficient during the test is referred to a review and reengineering group for corrective action and becomes subject to follow-up testing. The required corrective action details the type, scope, and severity of the deficiency and provides step-by-step procedures for resolving the failure, designating responsibility and due dates for each corrective action stop.

[REDACTED]

5.9.3 Maintaining the Plan

Appendix B References #239 – 240

The DR/BC Plan will be maintained and updated at least annually throughout the life of the contract by assigned project personnel. It will be submitted to the Exchange for your review and approval. In cases where systems, procedures, personnel, service providers, key vendors, and other changes occur, the DR/BC Plan will be reviewed and revised to reflect the new information. As discussed, the Plan is also updated, as needed, to reflect testing results, internal audits, and external audits by the Exchange.

A revision history is maintained at the beginning of the Plan, and KMS users, including the Exchange, are notified of major revisions as they occur. In the event we receive a request that would indicate an increased risk of disaster, per the DR/BC Plan, we will immediately notify the Exchange and work with you to develop the most appropriate response or solution.

5.9.4 Disaster Prevention

Focusing on disaster prevention allows us to mitigate some of the more common instances of operational risks, such as loss or corruption of data, loss of services (telephone, data network, Internet), loss of power, equipment failure, and unavailability of staff. These prevention strategies, developed through years of experience operating similar health and human services projects, include security and backup procedures for safeguarding data and protecting network integrity. These help us to prevent or quickly recover from data loss due to hardware and software failures, human error, natural disasters, and other emergency situations.

[REDACTED]

[REDACTED]

Real-life scenario

9/11 Lessons

[REDACTED]

[REDACTED]

[REDACTED]

Many different scenarios can bring disastrous consequences for a business, including security breaches and damage to data through loss, virus infection, or unauthorized access. Our disaster prevention and security strategies contribute to our comprehensive DR/BC planning for the Exchange Call Center.

5.9.5 Exchange Call Center DR/BC Specifics

In the event that a disaster befalls the Exchange Call Center, we will work hand-in-hand with the Exchange to execute the approved DR/BC Plan at the appropriate response level. With the strength and commitment of our corporate structure, and as shown by past experience, we can also marshal additional

[REDACTED]

It should be assumed that some reduced level of operations must be endured during the primary post-disaster recovery period. For planning purposes, two key issues need to be determined: (1) for which applications are post-disaster survival plans critical and (2) which critical applications need urgent attention as soon as the recovery effort begins.

[REDACTED]

Through this process, MAXIMUS can better identify an application's vulnerability to performance degradation when a disaster occurs, as well as the constraints that may be present when the application must be restored. Collectively, these factors establish the relative importance of the post-disaster recovery of specific applications or services. For all functions, we will work with the Exchange to

identify those areas that may constitute mission-critical or priority systems and services, allowing for prioritizing recovery of certain applications or services.

5.9.5.3 Emergency Response

MAXIMUS understands that, at times, a call center may experience issues including threats to individuals or the site itself, theft of property, an information security breach, or an emergency situation that requires swift and decisive action. To ensure consistent and effective response to these situations, we develop protocols for the handling of these situations in advance and ensure all staff is fully trained upon hire, avoiding the possibility of confusion or an improper response should such an incident arise. [REDACTED]



We prepare our staff to respond to emergency situations in a calm, orderly fashion based on pre-determined plans that protect employee health and safety and maintain security standards.

Each of our call centers has a detailed evacuation plan that is posted in multiple areas of the office, and regular drills are scheduled to ensure that staff knows exactly what is expected during an evacuation or other emergency. Continuing operations during this time will depend upon the situation itself. In the event of a non-emergency evacuation, such as a fire drill, where employees are only temporarily out of the Call Center, we can quickly enable a pre-recorded message that will play for callers, explaining the temporary nature of our absence, and providing the opportunity to leave voice mail for a call back.

As an organization, we understand the importance of protecting the highly sensitive information, including Protected Health Information (PHI), Personally Identifiable Information (PII), and other confidential consumer data to which we have access. We have dedicated corporate and division level security and privacy officials who have created guidelines and procedures for staff to stress the importance of protecting sensitive information and to properly document and report issues should they occur. MAXIMUS provides each staff member with thorough HIPAA training, not only to avoid breaches, but also to educate staff on the importance of properly reporting disclosures. Protecting this highly sensitive data continues to be our mission during any type of outage or disruption of services, including evacuation of the premises. Further details about our security policies can be found in *Section 5.6: Information Security, Data Privacy, and Sarbanes-Oxley Compliance*.

Exhibit 5.9-5: Emergency Response Matrix summarizes some of the situations which require quick response by staff to ensure everyone's health and safety in our project sites as well as at our corporate offices and data centers.

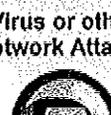
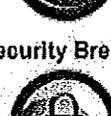
Incident	Summary of Initial Response
Fire 	<ul style="list-style-type: none"> ■ Attempt to extinguish if small and safe to do so ■ Notify others and evacuate the area or building ■ Call 911 and/or pull fire alarm ■ Account for all staff and visitors at pre-determined check-in sites in parking lot or nearby meeting place ■ Rescue backup tapes if safe to do so
Flood 	<ul style="list-style-type: none"> ■ Notify others and move to higher ground if flash flood ■ Work from home and communicate with staff to stay home, if appropriate ■ Obtain news and weather reports and emergency instructions through the use of an emergency radio or other battery-operated device in the event of a power outage
Inclement Weather 	<ul style="list-style-type: none"> ■ Move to safe area as appropriate to the situation: <ul style="list-style-type: none"> • Basement or lower level or inside room for tornado, away from windows • Inside and away from windows and electrical equipment for a storm with lightning ■ Heed hurricane warnings and stay home or evacuate as advised by local authorities ■ Obtain news and weather reports and emergency instructions through the use of an emergency radio or other battery-operated device in the event of a power outage
Earthquake 	<ul style="list-style-type: none"> ■ Move to safe area under doorways, inside, under heavy furniture to protect from falling ceilings or glass ■ Exit the building when safe to do so ■ Evacuate following the event until the building has been deemed safe to re-enter ■ Obtain news and weather reports and emergency instructions through the use of an emergency radio or other battery-operated device in the event of a power outage
Power Outage 	<ul style="list-style-type: none"> ■ Stay calm and communicate with others ■ Continue operations normally, if safe to do so, under 8-hour emergency battery power ■ Retrieve and use flashlights or navigate by emergency lighting ■ Wait out the situation until the situation can be fully assessed for cause and duration, at which point, act accordingly or as told to do so by local authorities or building management ■ Obtain news and weather reports and emergency instructions through the use of an emergency radio or other battery-operated device in the event of a power outage
Pandemic 	<ul style="list-style-type: none"> ■ Follow advice of local authorities ■ Cross-train staff to cover mission-critical operations in the event many staff are out sick ■ Partnership with staffing firm to help augment staff in emergency situation ■ Use as many home-based CCRs as possible to accommodate call volumes
Virus or other Network Attacks 	<ul style="list-style-type: none"> ■ Immediately unplug infected device and contact corporate Office of Information Services, Security and Audit department ■ Follow instructions to eradicate virus and test equipment ■ Follow up with preventive measures for future protection ■ Obtain IT approval prior to reconnecting device
Security Breach 	<ul style="list-style-type: none"> ■ Immediately contact corporate Office of Information Services, Security and Audit department ■ Notify Project management and client (through proper channels as established by contract) ■ If appropriate, notify corporate Compliance Officer and/or Privacy Official

Exhibit 5.9-5: Emergency Response Matrix. We will use this basic response matrix as a model for making sure the Exchange Call Center has similar procedures in place.

Incident	Summary of Initial Response
<p>Employee Termination</p> 	<ul style="list-style-type: none"> ■ Immediately disable all employee user accounts, access cards, badges, e-mail, intranet, CRM, KMS, WFM, and other systems, and other access ■ Immediately change systems administrator passwords if the employee had those passwords and rights, including servers, switches, routers, firewalls ■ Immediately disable key vendor account access that the employee may have had (for ordering or cancelling services or other key operations components) ■ Escort the employee from the office and retrieve badge(s), files, computers, and other items belonging to the Project ■ Notify receptionist and/or security guards of potential issues ■ Notify corporate office
<p>Workplace Violence</p> 	<ul style="list-style-type: none"> ■ Ensure the safety of employees first ■ Notify local authorities as soon as possible by calling 911 ■ Educate employees on how best to handle volatile situations or individuals ■ Ensure that procedures are in place to notify other employees in the area in order to accommodate their safety
<p>Nuclear Power Plant Incident</p> 	<ul style="list-style-type: none"> ■ Ensure the safety of employees first ■ Follow direction provided by local authorities for evacuation or other recommended response ■ Obtain news and weather reports and emergency instructions through the use of an emergency radio or other battery-operated device in the event of a power outage
<p>Suspicious Mail</p> 	<ul style="list-style-type: none"> ■ DO NOT OPEN suspicious mail ■ Isolate the mailing and evacuate the immediate area ■ Do not put the mail parcel in water or in a confined space (such as desk drawer or filing cabinet) ■ If possible, open windows in the immediate area to assist in venting potential explosive gases ■ If you have any reason to believe a letter or package is suspicious, do not take a chance, or worry about possible embarrassment if the item turns out to be innocuous. Instead, immediately notify your supervisor. ■ A manager or supervisor will then contact the local police department and Postal Inspector for professional assistance ■ Note: All employees who handle incoming mail shall wear protective gloves. Additionally, they shall be afforded the opportunity to wear aprons and protective masks if they so desire.
<p>Terrorist Attack</p> 	<ul style="list-style-type: none"> ■ Ensure the safety of employees first ■ Follow direction provided by local authorities for evacuation or other recommended response ■ Obtain news and weather reports and emergency instructions through the use of an emergency radio or other battery-operated device in the event of a power outage

Exhibit 5.9-5: Emergency Response Matrix (continued). We will use this basic response matrix as a model for making sure the Exchange Call Center has similar procedures in place.

While we do our best to avoid emergency circumstances, we have experienced situations that were unexpected and beyond our control

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5.9.5.4 Key Contacts and Communications Plan

Appendix B References #242, 245 - 246, 250

In the event a crisis situation occurs, we will have in place appropriate mechanisms for contacting designated Exchange personnel. [REDACTED]

Our key contacts also include our subcontractors and service and account representatives for the vendors and suppliers who provide equipment, telephone services, data and telephone circuits, building services, and other important hardware, software, or services in support of Exchange Call Center operations.

An event/incident is communicated to appropriate personnel as soon as possible once the event/incident has taken place. These are typically situations involving a single employee (example: personal injury, health problem, etc.) or a facility/system/technology problem (example: outage or loss of system/technology service).

An emergency will be declared when an event/incident or weather threatens or causes a facility to be closed. We will immediately contact designated Exchange personnel to confer and agree on Plan execution elements and next steps. If there is an immediate danger to employee safety, appropriate action will be taken as warranted by the situation. The Site Manager will immediately seek assistance from emergency responders, such as police, fire, or medical services. After ensuring employee safety during a dangerous situation, Site Managers will notify the MAXIMUS corporate contact.

We often use an Escalation Call Tree for use in emergency situations requiring contact of staff members. This Call Tree will be updated at least monthly to reflect additions, changes, and deletions to the staff at the various locations and distributed to the appropriate staff. This list is not for distribution outside of the Project staff nor should it be used for anything other than its intended purpose. This list should be printed and distributed to the individuals required to perform calls to peers and/or subordinates in the event of an emergency or disaster. Those receiving the list should maintain copies both at work and at home in order to be able to execute the procedure in either location.

The list begins with the project management team, who are tasked with calling their direct reports. These managers or leads, in turn, call their supervisors who will, in turn, call their staff. If anyone is unable to contact the next level in the call tree, they are required to proceed to call those under the individual they were unable to reach.

[REDACTED]

Communications with all key stakeholders in the event of a disaster or major outage will be discussed and agreed upon during the Transition phase of the Call Center. We understand that the Exchange will want

to provide input in the finalization of this plan and will provide final approval. We also understand that in no case are we to discuss the situation with third parties not pre-approved by the Exchange.

5.9.5.5 Pricing Impact

Appendix B Reference #253

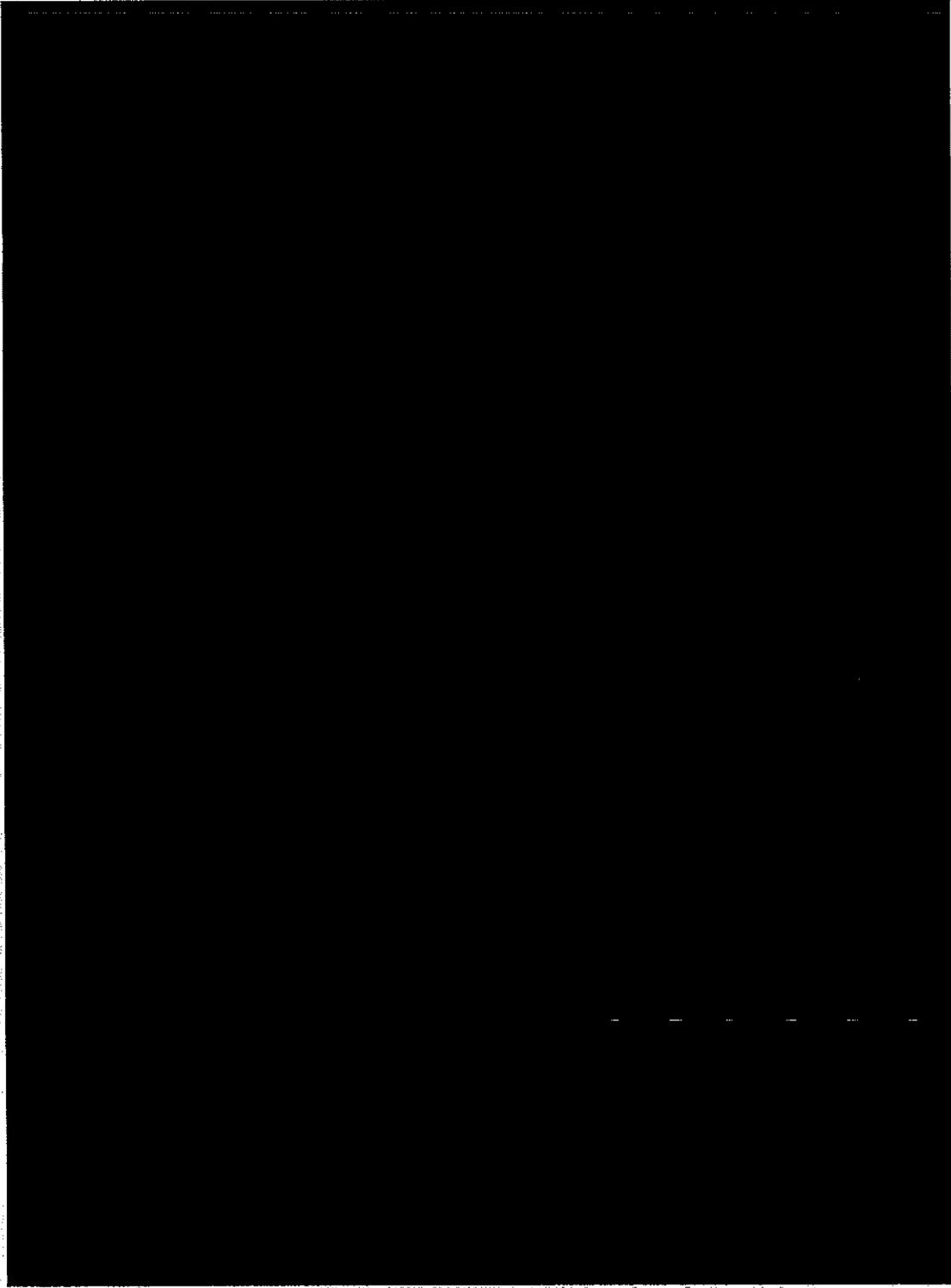
[REDACTED]

We will gladly discuss these options further with the Exchange upon contract award.

5.9.5.6 Assumed Risks and Liabilities

Appendix B Reference #254

We will work closely with the Exchange to fully identify risks and associated liabilities upon contract award. In general, we would assume responsibility for the equipment, services, facilities, and personnel over which we have full control.



[REDACTED]

5.10.1.1

[REDACTED]

[REDACTED]

5.10.1.2

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]

[REDACTED]

5.10.3 [REDACTED]

[REDACTED]

[REDACTED]

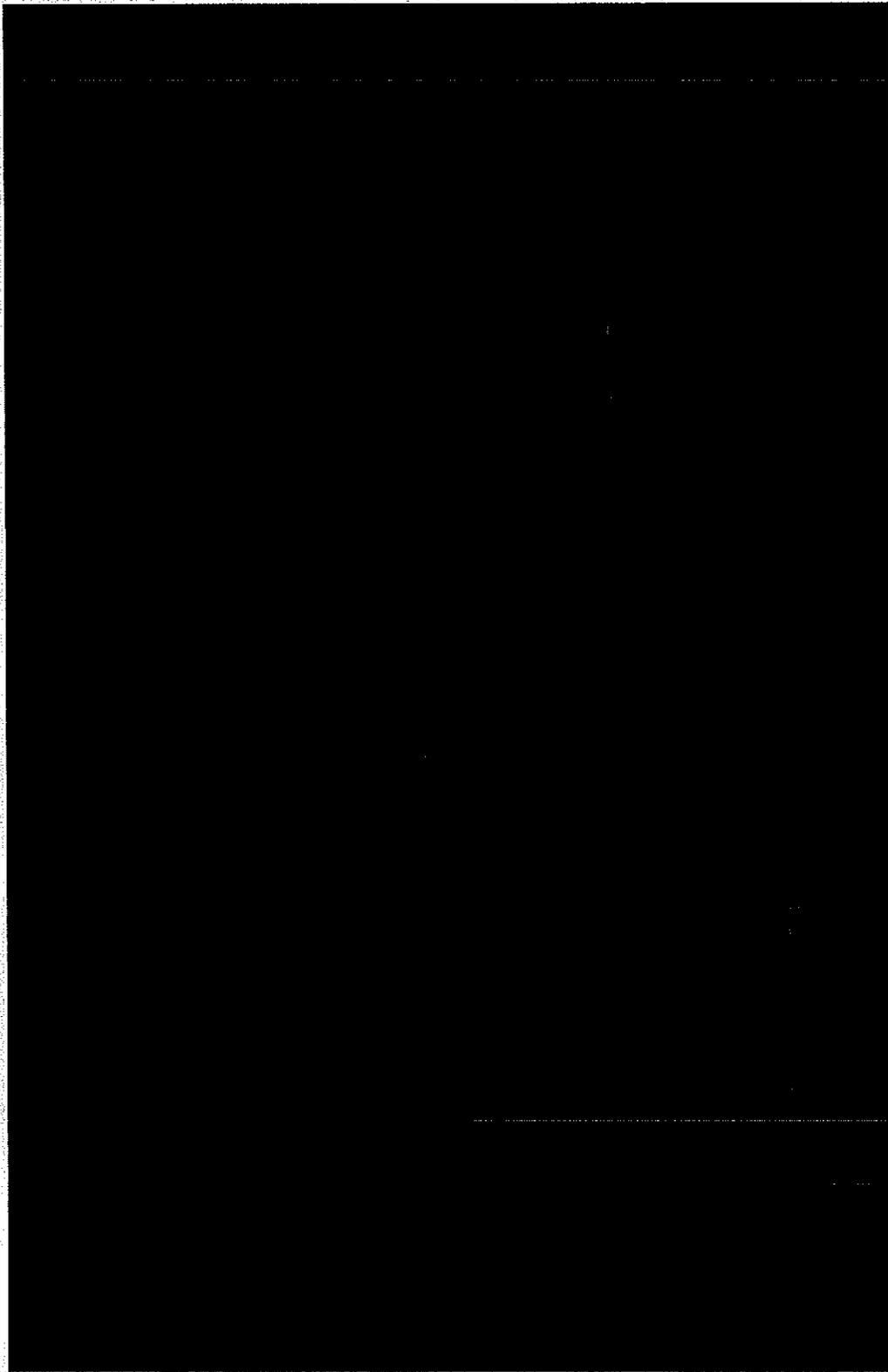
[REDACTED]

5.10.3.1 [REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]

[REDACTED]



[REDACTED]

5.10.7 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

