




The following documentation is an electronically-submitted vendor response to an advertised solicitation from the *West Virginia Purchasing Bulletin* within the Vendor Self-Service portal at ***wvOASIS.gov***. As part of the State of West Virginia's procurement process, and to maintain the transparency of the bid-opening process, this documentation submitted online is publicly posted by the West Virginia Purchasing Division at ***WVPurchasing.gov*** with any other vendor responses to this solicitation submitted to the Purchasing Division in hard copy format.

## Header 1

 List View

## General Information

Contact

Default Values

Discount

Document Information

Procurement Folder: 376002

SO Doc Code: CRFQ

Procurement Type: Central Master Agreement

SO Dept: 0511

Vendor ID: 000000100824

SO Doc ID: HHR1800000002

Legal Name: PUBLIC CONSULTING GROUP INC

Published Date: 10/24/17

Alias/DBA:

Close Date: 11/2/17

Total Bid: \$642,542.08

Close Time: 13:30

Response Date: 10/24/2017

Status: Closed

Response Time: 6:59

Solicitation Description: Addendum One-DHHR Asset Verification System

Total of Header Attachments: 1

Total of All Attachments: 1



Purchasing Division  
 2019 Washington Street East  
 Post Office Box 50130  
 Charleston, WV 25305-0130

**State of West Virginia  
 Solicitation Response**

**Proc Folder :** 376002

**Solicitation Description :** Addendum One-DHHR Asset Verification System

**Proc Type :** Central Master Agreement

Date issued	Solicitation Closes	Solicitation Response	Version
	2017-11-02 13:30:00	SR 0511 ESR10241700000001745	1

<b>VENDOR</b>
000000100824 PUBLIC CONSULTING GROUP INC

**Solicitation Number:** CRFQ 0511 HHR1800000002

**Total Bid :** \$642,542.08      **Response Date:** 2017-10-24      **Response Time:** 06:59:30

**Comments:**

**FOR INFORMATION CONTACT THE BUYER**  
 Charles D Barnette  
 (304) 558-2566  
 charles.d.barnette@wv.gov

<b>Signature on File</b>	<b>FEIN #</b>	<b>DATE</b>
--------------------------	---------------	-------------

All offers subject to all terms and conditions contained in this solicitation

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
1	System or application programming management service				\$398,000.00

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #1 AVS Services Web Portal Access by December 31, 2017 (Section 3.1.1 of REQUEST FOR QUOTATION-Asset Verification Services)
-------------------------------	--

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
2	System or application programming management service				\$244,500.00

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #2 AVS Services Interface by March 1, 2018 (Section 3.1.2 of REQUEST FOR QUOTATION-Asset Verification Services)
-------------------------------	--

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
3	System or application programming management service				\$4.99

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #3 AVS Services Delivery by March 1, 2018 (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services) Year 1 - Individual Asset Verification Rate-Liquid Assets
-------------------------------	--

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
4	System or application programming management service				\$1.83

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #3 AVS Services Delivery by March 1, 2018 (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services) Year 1 - Individual Asset Verification Rate-Real Property and Life Insurance
-------------------------------	---

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
5	System or application programming management service				\$5.04

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #3 AVS Services Delivery (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services) Optional Renewal Year 2 - Individual Asset Verification Rate-Liquid Assets
-------------------------------	--

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
6	System or application programming management service				\$1.87

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #3 AVS Services Delivery (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services) Optional Renewal Year 2 - Individual Asset Verification Rate-Real Property and Life Insurance
-------------------------------	---

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
7	System or application programming management service				\$5.09

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #3 AVS Services Delivery (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services) Optional Renewal Year 3 - Individual Asset Verification Rate-Liquid Assets
-------------------------------	--

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
8	System or application programming management service				\$1.91

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #3 AVS Services Delivery (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services) Optional Renewal Year 3 - Individual Asset Verification Rate-Real Property and Life Insurance
-------------------------------	---

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
9	System or application programming management service				\$5.14

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #3 AVS Services Delivery (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services) Optional Renewal Year 4 - Individual Asset Verification Rate-Liquid Assets
-------------------------------	--

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
10	System or application programming management service				\$1.93

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #3 AVS Services Delivery (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services) Optional Renewal Year 4 - Individual Asset Verification Rate-Real Property and Life Insurance
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Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
11	System or application programming management service				\$5.17

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #3 AVS Services Delivery (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services) Optional Renewal Year 5 - Individual Asset Verification Rate-Liquid Assets
-------------------------------	--

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
12	System or application programming management service				\$1.95

Comm Code	Manufacturer	Specification	Model #
81111511			

<b>Extended Description :</b>	Contract Item #3 AVS Services Delivery (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services) Optional Renewal Year 5 - Individual Asset Verification Rate-Real Property and Life Insurance
-------------------------------	---

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
13	System or application programming management service				\$5.19

Comm Code	Manufacturer	Specification	Model #
81111511			

**Extended Description :** Contract Item #3  
 AVS Services Delivery (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services)  
 Optional Renewal Year 6 - Individual Asset Verification Rate-Liquid Assets

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
14	System or application programming management service				\$1.97

Comm Code	Manufacturer	Specification	Model #
81111511			

**Extended Description :** Contract Item #3  
 AVS Services Delivery (Section 3.1.3 of REQUEST FOR QUOTATION-Asset Verification Services)  
 Optional Renewal Year 6 - Individual Asset Verification Rate-Real Property and Life Insurance

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Ln Total Or Contract Amount
15	System or application programming management service	50.00000	EA	\$0.000000	\$0.00

Comm Code	Manufacturer	Specification	Model #
81111511			

**Extended Description :** Contract Item #4  
 Future AVS Services Licensing Costs (Section 3.1.4 of REQUEST FOR QUOTATION-Asset Verification Services)



# West Virginia Department of Health and Human Resources

Asset Verification System Services

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October 26, 2017

RFP#: CRFQ 0511 HHR1800000002

Mr. Charles Barnette  
West Virginia Purchasing Division  
2019 Washington ST E  
Charleston, WV 25305



148 State Street, Tenth Floor, Boston, Massachusetts 02109  
Tel. (617) 426-2026, Fax. (617) 426-4632  
[www.publicconsultinggroup.com](http://www.publicconsultinggroup.com)



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# Transmittal Letter

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Public Focus. Proven Results.™

www.publicconsultinggroup.com

October 26, 2017

Mr. Charles Barnette  
West Virginia Purchasing Division  
2019 Washington ST E  
Charleston, WV 25305

Re: ***CRFQ 0511 HHR180000002 DHHR Asset Verification System***

Dear Mr. Barnette,

Public Consulting Group, Inc. (PCG) is pleased to submit our proposal to the State of West Virginia in response to your Asset Verification System solicitation. PCG is eager to assist the State in adopting cost saving measures which can reduce expenditures while ensuring the integrity of your benefits programs. Procuring an asset verification system (AVS) is just such a measure as it will not only reduce enrollment levels by discovering ineligible and/or fraudulent applicants and beneficiaries, but will also increase worker productivity through the introduction of automation into the eligibility determination process.

The team of PCG, Accuity, and LexisNexis has successfully implemented AVS solutions together around the United States and offers West Virginia access to financial data from 100 percent of the nation's financial institutions and property data aggregated from more than 10,000 public and private data sources. Accuity financial data is considered the industry standard and is currently being used by every active, CMS-compliant Medicaid AVS in the United States. LexisNexis property data is relied on by states like Texas and New York and is in use in more Medicaid AVS solutions than that of any other data vendor.

While the quality of the financial institution and property data is critical to any successful AVS deployment, just as critical is the selected vendor's: (1) AVS experience, (2) Medicaid expertise, and (3) and AVS project manager. PCG is the only firm in the United States who meets each of these qualifications, as follows:

- ✓ ***Medicaid AVS Experience:*** PCG is engaged in 20 states to provide Medicaid asset verification services; more than all of our competitors combined by a wide margin. This experience and expertise ensures best practices and lessons learned will be incorporated into PCG's proposed AVS while allowing for a precise, meticulous and low-risk implementation.
- ✓ ***Medicaid Expertise:*** PCG is a recognized national leader in Medicaid management, systems, and operational consulting services and has spent the past 30 years working tirelessly with Medicaid agencies in all 50 states to solve problems and enhance programs by implementing innovative solutions used to reduce costs, improve operations, and ensure program integrity. PCG is focused exclusively on public sector services and currently has more than 2,500 active agency projects across the United States.
- ✓ ***Experienced Medicaid AVS Project Manager:*** The State of West Virginia can ensure best practices and lessons learned are incorporated into your AVS implementation by selecting an

AVS project manager who has spent the past five years working in the trenches with Medicaid agencies around the United States to ensure successful Medicaid AVS implementations. PCG's proposed AVS project manager has successfully implemented more than a dozen AVS programs across the United States and is easily the nation's most experienced AVS project manager.

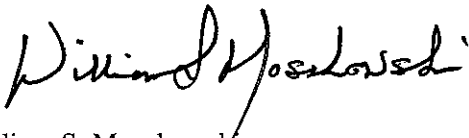
PCG is proud to offer the State of West Virginia a proven AVS solution which will be ready on day one to allow your workers to access 100 percent of the nation's financial institutions and properties through a proven AVS web service supported by the nation's foremost experts in asset verification.

Questions or communications regarding this submission may be directed to the following individual:

Peter H. Cheesman  
Public Consulting Group, Inc.  
148 State Street  
Boston, MA 02109  
Phone: (207) 861-1950  
Email: pcheesman@pcgus.com

We appreciate the opportunity to present our AVS solution to the State of West Virginia and look forward to your review of our proposal.

Sincerely,



William S. Mosakowski  
President & CEO  
Public Consulting Group, Inc.

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# Proposal Cover Page

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Purchasing Division  
 2019 Washington Street East  
 Post Office Box 50130  
 Charleston, WV 25305-0130

State of West Virginia  
 Request for Quotation  
 14 – Financial

Proc Folder: 376002

Doc Description: DHHR Asset Verification System

Proc Type: Central Master Agreement

Date Issued	Solicitation Closes	Solicitation No	Version
2017-10-12	2017-10-26 13:30:00	CRFQ 0511 HHR1800000002	1

**BID RECEIVING LOCATION**

BID CLERK  
 DEPARTMENT OF ADMINISTRATION  
 PURCHASING DIVISION  
 2019 WASHINGTON ST E  
 CHARLESTON WV 25305  
 US

**VENDOR**

Vendor Name, Address and Telephone Number:  
 Public Consulting Group, Inc.  
 148 State Street, 10th Floor  
 Boston, MA 02109  
 617-426-2026

**FOR INFORMATION CONTACT THE BUYER**

Charles D Barnette  
 (304) 558-2566  
 charles.d.barnette@wv.gov

Signature X

FEIN # 04-2942913

DATE 10/23/17

All offers subject to all terms and conditions contained in this solicitation

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# 1. Executive Summary

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## 1. EXECUTIVE SUMMARY

The availability of enhanced federal financial participation for eligibility verification enhancements (*CMS–2346–F*), combined with new asset verification requirements included in the Affordable Care Act and Section 1940 of the Social Security Act, make this the right time for the State of West Virginia to invest in enhancing the automation and improving the accuracy of your eligibility determination processes by implementing asset verification services (AVS).

Public Consulting Group, Inc. (PCG) has successfully implemented asset verification services in more Medicaid agencies than all other vendors combined. Given this experience, as well as PCG's long history working with state health and human services agencies on Medicaid eligibility systems and solutions, no other vendor is better positioned to ensure the State of West Virginia's seamless implementation of their Asset Verification System.

### ***PCG Maintains Access to 100% of the Nation's Financial Institutions***

PCG has worked with the nation's leading financial institution data provider to offer our Medicaid asset verification services clients access to 100 percent of the nation's financial institutions and will do so again if awarded this work. PCG, and our asset verification data provider, Accuity, provide an electronic, automated asset verification service that has been proven in Medicaid agencies across the country and is fully compliant with Section 1940 of the Social Security Act. PCG and Accuity form the only AVS team in the United States with access to *100 percent of the nation's financial institutions*, allowing our clients to avoid legislation requiring Financial Institution (FI) participation and allowing us to query large multinational banks, regional and online banks, and small FIs and credit unions to identify undisclosed assets.

PCG understands that one or more of our competitors may also be proposing to use Accuity asset verification data. It is important that the State understand that only PCG is using Accuity data in 19 other states, compared to just a few states featuring this data from our nearest competitor. PCG's deep experience and expertise working with Accuity data will ensure a timely and meticulous AVS implementation in the State of West Virginia.

### ***PCG Offers the Most Comprehensive Property Data in the United States***

PCG leverages LexisNexis's data repository of public records and commercially available data to identify Real Property. The LexisNexis repository is the largest and fastest-growing such repository in the country, and links together in excess of 44 billion records drawn from over 10,000 disparate sources, accounting for 700 million unique identities. Data sources are refreshed daily, meaning that the information that will be provided is no older than this morning. In addition to the current data store, an average of 30 million raw files are processed daily, continually adding to the breadth of information available to DHHR.

LexisNexis's Property Data includes over 3.2 billion property and assessment records which are updated daily from 48 states, going back as far as 1970, as well as deed and mortgage records from all 50 states, going back as far as 1910.

### ***PCG is the Most Experienced AVS Vendor in the United States***

Only PCG has been engaged to implement asset verification services on behalf of 19 state health and human services agencies across the United States, more than all of our competitors combined. This experience ensures best practices and lessons learned will be applied to ensure a precise and meticulous AVS implementation in the State of West Virginia, as evidenced by the following applicable PCG experience:



Project	Asset Verification	Property Verification	Additional Eligibility Verification
Colorado Department of Healthcare Finance & Policy	✓		
Delaware Division of Medicaid and Medical Assistance	✓	✓	✓
District of Columbia Department of Human Services	✓		
Iowa Department of Social Services	✓		
Maine Department of Health and Human Services	✓	✓	✓
Maryland Department of Human Resources	✓	✓	✓
Massachusetts Executive Office of Health and Human Services	✓		
Montana Department of Public Health and Human Services	✓		
Nevada Department of Health and Human Services	✓		
New Hampshire Department of Health and Human Services	✓		✓
New Jersey Department of Human Services	✓		
New York City Human Resources Administration/Department of Social Services (HRA/DHR)	✓	✓	✓
New York State Department of Health	✓	✓	✓
North Carolina Division of Medical Assistance	✓		
South Dakota Department of Social Services	✓		
Oklahoma Health Care Authority	✓		
Texas Health and Human Services Commission	✓	✓	✓
Utah Department of Workforce Services	✓		
Wisconsin Department of Health Services	✓		✓

**PCG's AVS Saves our Clients Money**

PCG's thoughtful and comprehensive approach to asset verification allows our clients to realize millions of dollars in cost savings per year, as follows:

- ✓ **Program Integrity Savings:** PCG's other AVS clients have identified between 4 and 8 percent of long-term care applicants and beneficiaries as ineligible. If PCG helped the State of West Virginia identify just 4 percent of your approximately 55,000 applicable enrollees as ineligible through the use of PCG's AVS, the State would realize \$44 million in annual cost savings assuming an average annual cost of \$20,000 per applicant/member.
- ✓ **Staff Time Savings:** In addition to the cost savings resulting from identifying undisclosed resources, PCG's proposed national, pre-enrollment AVS will also significantly reduce the time your workers are required to spend collecting, reviewing, and data entering the physical bank account information currently required to verify the resource-based eligibility of your ABD population. PCG's AVS allows our clients to forego collecting physical bank statements *except* in the event that our AVS flags someone as exceeding program limits. PCG's AVS allowed North Carolina's Division of Medical Assistance (DMA) to automate and replace the collection and review of 60 months' worth of bank statements for more than 240,000 applications and recertifications for Aged, Blind and Disabled services during the first 12 months of the program. If

collecting and processing 60 months' worth of account statements previously took DMA's eligibility staff just a single hour, PCG's AVS saved DMA the equivalent of one years' worth of work from 108 eligibility worker FTEs in just 12 months.

- ✓ **Enhanced Federal Reimbursement:** In accordance with federal requirements (Medicaid Program; Federal Funding for Medicaid Eligibility Determination and Enrollment Activities - CMS–2346–F), states implementing AVS are eligible for enhanced 75 percent federal financial participation (FFP) for the implementation and operation of asset verification services. PCG has helped several of our clients realize this enhanced FFP and can assist the State of West Virginia in doing the same.

Lastly, the uncertain future of the Affordable Care Act and the State's December 2017 go live requirement, suggests that the State would be best served by choosing an asset verification vendor which represents the least operational risk to the State while ensuring the greatest opportunity for cost savings.

As the country's most trusted asset verification vendor and the only AVS vendor who has managed AVS implementations across the United States, PCG is a proven AVS commodity capable of guiding this implementation with a stable hand and a meticulous work plan supported by best practices and lessons learned over five years of AVS implementations across 19 states.

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## 2. Scope of Work

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## 2. SCOPE OF WORK

PCG has been **engaged by more state Medicaid agencies to provide asset verification services than all other vendors combined**. PCG intends to leverage this experience to improve our clients' asset verification capabilities in the following critical ways:

- ✓ PCG's AVS includes every financial institution in the United States and will allow agency workers to electronically request bank account information from any of these financial institutions, regardless of location.
- ✓ PCG's AVS won't just pass AVS data to agency clients; we apply our proprietary analytics to this data to automatically identify assets exceeding program limits, potentially disqualifying asset transfers, previously undisclosed assets, spouse assets impacting resource calculations, account types which are excludable when calculating resources, and more.
- ✓ PCG's AVS will eliminate the need for your workers to manually enter AVS requests by allowing for real-time web services calls and/or nightly batch file exports from agency eligibility systems.
- ✓ PCG's AVS is configurable to be accessed via either (1) web services from an agency's eligibility system, (2) via PCG's stand-alone AVS portal, and/or (3) as a modular extension of an agency's eligibility system via PCG's proprietary Click-Through Gateway, which allows workers to click-through from an eligibility system directly into the same case in PCG's AVS portal without additional authentication.
- ✓ PCG's AVS is easily scalable to allow our agency clients to access nearly 50 additional commercial, state and/or federal eligibility verification data sources – including property data – with whom PCG has established, existing interfaces and APIs.
- ✓ PCG's AVS will be implemented and supported by the most experienced AVS project managers in the United States.
- ✓ PCG's AVS will expedite worker case processing timeframes, while identifying more fraud and ineligibility than any other AVS vendor, both of which will significantly increase AVS cost savings realized by any states using PCG's AVS.

Only PCG has been engaged to implement asset verification services on behalf of Medicaid agencies across the United States, including on behalf of New York, Texas, North Carolina, Colorado, Wisconsin, Massachusetts, New Hampshire, Maine, District of Columbia, Oklahoma, Maryland, Iowa, Delaware, Montana, Nevada, New Jersey, New York City, South Dakota, and Utah. This experience ensures best practices and lessons learned will be applied to ensure a precise and meticulous AVS implementation in any states procuring AVS.

As the country's most trusted asset verification vendor and the only AVS vendor who has managed more than a dozen Medicaid AVS implementations across the United States, PCG is a proven AVS commodity capable of guiding this implementation with a stable hand and a meticulous work plan supported by best practices and lessons learned over nearly five years of AVS implementations.

The team of PCG, Accuity, and LexisNexis offer the State the most proven Medicaid AVS solution in the United States which is fully compliant with CMS' asset verification guidelines, as well as Section 1940 of the Social Security Act, as follows:

- ✓ *Request and response system must be electronic:* PCG's AVS is flexible and customizable to allow agencies to connect electronically via either web services calls, batch file transfers, and/or from within PCG's proprietary AVS Web Portal.

- ✓ *System must be secure based on recognized industry standards:* PCG's AVS complies with NIST, FIPS, and SAS 70 requirements. PCG's AVS adheres to the same authorization and confidentiality standards as the AVS used by the Social Security Administration and is compliant with NIST standards, The Financial Modernization Act of 1999 (Gramm-Leach Bliley), Privacy Act of 1974, Computer Security Act of 1987, OMB Circular A-130, Health Insurance Portability and Accountability Act of 1996, Fair Credit Reporting Act, HITECH Act, and more.
- ✓ *Must establish and maintain a database of financial institutions to participate:* For the 20<sup>th</sup> time, PCG has partnered with AVS data provider, Accuity. Accuity has established and retains what is by a wide margin the largest network of financial institutions in the United States today. Accuity is the only AVS data vendor in the United States with access to 100 percent of the nation's financial institutions.
- ✓ *Requests must also be sent to FIs other than those identified by the applicant:* PCG's AVS allows the State to access not only those financial institutions which are known to the State, but also sends every AVS request to all of the nation's largest financial institutions, as well as 10-15 additional financial institutions located within geographic proximity of the applicant's address.
- ✓ *Responses must include information on both open and closed accounts going back for a period of up to 5 years:* PCG not only provides 60 months of both open and closed account balances in our responses, we can also provide up to 12 additional months of account balances which may be necessary for those requests which are sent to PCG more than 1 month after application.
- ✓ *AVS must provide evidence that the search was completed even if no assets are located:* PCG's AVS identifies requests resulting in both a balance and requests resulting in no accounts being found within our AVS Web Portal.

Because PCG has been engaged by 19 other states to implement AVS, our AVS is a known commodity to CMS and around the country and has been deemed time and time again to be compliant with federal and state rules governing AVS.

On the following pages, PCG has addressed each of the State's procurement specifications.

## 2.1 AVS Services Web Portal

PCG, in concert with three state Medicaid agencies, designed and deployed a scalable, configurable asset verification Web application to support states' asset verification services with thoughtful attention paid to the operational, policy, and workflow considerations which are important to state agencies. This proven Web application is now being used by seven states and truly differentiates PCG from other asset verification vendors for the following reasons:

Differentiator	PCG's AVS Web Application	Why it Matters
<b>Proven in Live Medicaid Environments</b>	PCG's AVS Web Portal is the only AVS Web portal in the United States to have been previously proven in live Medicaid environments, including on behalf of the Medicaid agencies in Oklahoma, New York, Massachusetts, Washington, DC, South Dakota, Maine, Texas, and in the next months, Maryland, Delaware, Utah, and Montana.	A Medicaid-proven AVS Web Portal ensures a precise, expeditious implementation and reduces the need for unnecessary Agency staff time.

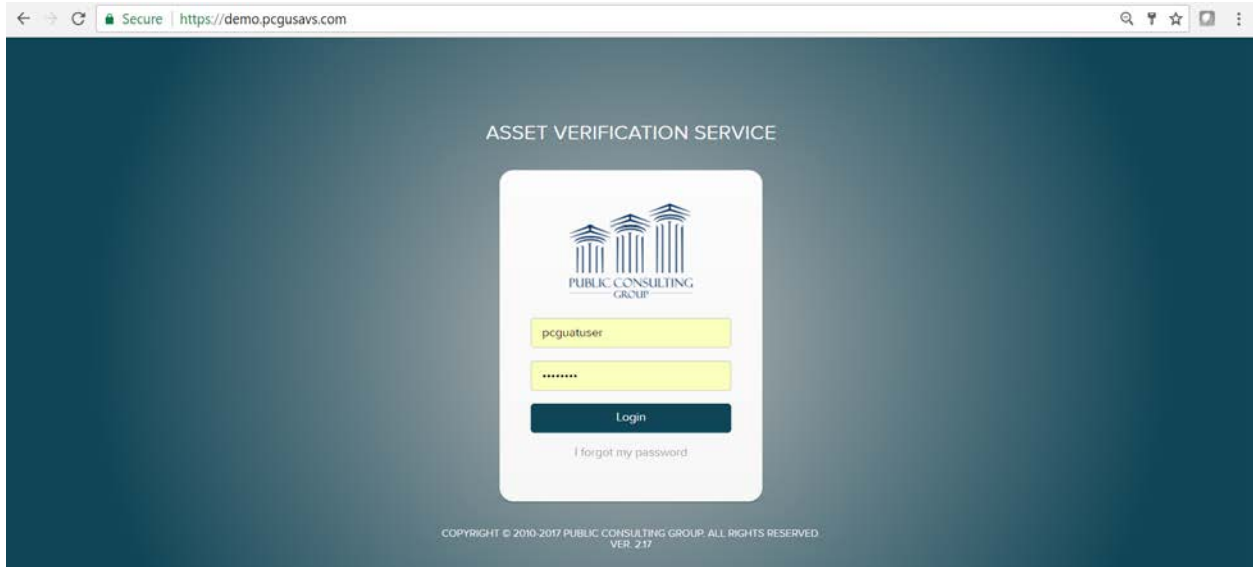
<p><b>Designed in Concert with Medicaid Eligibility Policy and Operations Staff</b></p>	<p>PCG's AVS Web Portal was conceptualized and designed over two years with daily input and instruction from actual Medicaid eligibility administrators, policy managers, and workers, going through more than 20 iterations until it perfectly suited each user group.</p>	<p>An AVS Web Portal built based on best practices and in consideration of lessons learned over years of use ensures its usability and usefulness for years to come.</p>
<p><b>Built to Enhance Automation and Expedite Eligibility Decisions</b></p>	<p>PCG's AVS Web Portal automates the collection and review of physical bank statements, compares account balances with program limits to preliminarily indicate eligibility/ineligibility, calculates ineligibility risk, and flags assets over program limits and potentially disqualifying asset transfers.</p>	<p>An AVS Web Portal which automates resource-based eligibility calculations and the discovery of disqualifying behaviors eliminates the potential for human error and reduces the staff time needed for resource-based eligibility decisions.</p>
<p><b>Developed to be Configurable and Scalable</b></p>	<p>PCG's AVS Web Portal is designed to be completely configurable to allow our clients to not only easily add new verification data sources (e.g. identity, property, income, residency, household composition, etc.), but also to quickly incorporate additional or changing business rules and/or flags reflecting new data requirements and/or changing program limits.</p>	<p>If the State is investing in a Web-based asset verification system, it makes sense that this system should be able to be easily scaled to include additional data sources and to quickly accommodate changing program limits and/or federal requirements.</p>
<p><b>Allows for Multiple AVS Submission Options</b></p>	<p>PCG's AVS Web Portal allows our clients to submit AVS requests via batch file, web services calls, and/or as individual, ad hoc AVS requests within the Portal.</p>	<p>Requiring your workers to manually data enter each and every AVS request into a Web portal is inefficient and subject to human error.</p>
<p><b>Performs Resource Calculations vs. Program Limits</b></p>	<p>PCG's AVS Web Portal not only generates AVS results with supporting data, but it also calculates identified account balances against program limits, excludes certain non-countable account types in these calculations, and automates eligibility determination support.</p>	<p>Automating the calculation of countable resource and comparing these resources to the applicable applicant program limits save time and money while reducing worker errors.</p>

**Simply put, PCG offers a *proven* and *complete* Web-based asset verification solution.** Saving taxpayer money by automating worker activities, improving eligibility determination decisions, better identifying fraud and abuse, and ensuring your dollars are spent on a scalable and configurable solution is the key differentiator between PCG's asset verification service and accompanying Web Portal and that of any other vendor.

PCG has detailed our AVS Web Portal in the following sections.

***User Management***

PCG offers independent, stand-alone access to our AVS Web Portal, which limits access to specific IP addresses but otherwise only requires an internet connection.

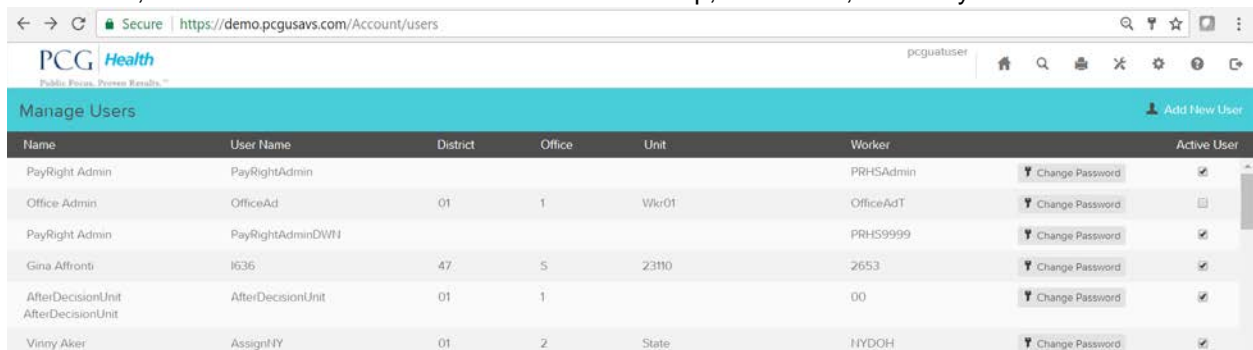


*AVS Web Portal Login*

For access to the AVS Web Portal as a stand-alone solution, PCG utilizes TLS 1.2 with SHA-2 certificates running SSL to the web based interface. For hashing user passwords, PCG uses the SHA256 hash algorithm used to sign SSL/TLS certificates. This means that clients accessing PCG webpages via HTTPS (for example, the PCG console, customer portal, or homepage) or accessing PCG API endpoints, whether through browsers or programmatically, must use the latest certificate bundles on their client machines.

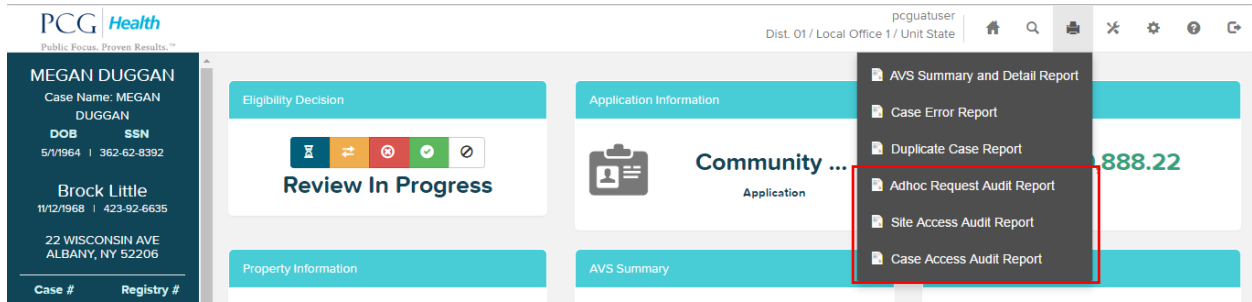
All passwords are required to be reset within 90 days (configurable) and page timeouts occur within 30 minutes when inactivity occurs.

PCG's AVS Web Portal includes dozens of role-based user roles, which allow our clients to limit access to certain portions of the site to certain authorized user roles. The Portal includes a User Management Dashboard, which will allow authorized State users to setup, deactivate, or modify a user's access.



*AVS Web Portal User Management Dashboard*

PCG tracks and monitors all user activity within the AVS Web Portal and provides standard Site Access Audit Reports and Case Access Audit Reports, each of which can be generated by authorized user roles at the push of a button.



*AVS Web Portal User Audit Reports.*

The Site Access Audit Report includes a log of each user's login and logout dates and times and can be customized by the user to include specific date ranges, counties, offices, units, and/or workers.

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Site Access Audit Report.

The Case Access Audit Report date and time stamps user access to specific cases based on user ID and can be customized by the user to include specific date ranges, counties, offices, units, and/or workers.

Case Access Audit Report

Each of these user management reports can be exported and/or printed in commonly used formats, including Excel, Word, PDF, and more.

User actions that modify data and visits in “view only” context to the Portal defined by the user’s role are recorded by the PCG application. Audit records include information to identify the user performing the action, date/time of change, fields modified, change type, system area of occurrence, and any users associated with the modification. All non-authenticated access attempts to the application as well as all HTTP requests for authenticated users are logged and archived. Information exchange with the database is stored within transaction logs. Authorized user access and changes to secure PCG resources, such as FTP, are recorded.

PCG utilizes multiple tools for log aggregation including centralized log gathering and correlation with alerting as well as firewall-based monitoring and attack prevention modules. These systems are monitored 24/7 by internal and third party managed system security provider that delivers actionable intelligence for event remediation.

All production firewalls that govern PCG’s information generate logs that account for all system access, changes, and violations. Information systems managing sensitive, valuable, or critical information securely log all events. Specific examples of relevant security events to be logged may include password guessing attempts, attempts to use privileges/services that have not been authorized, modifications to production application software, and modifications to system software. Logs are maintained both locally on the firewall and on a central logging server to provide a greater degree of integrity.

In order to ensure that users are held accountable for their actions on PCG systems, one or more records that trace relevant activities to specific users are securely maintained for 1 year within our logging and correlation system. Logs containing computer relevant security events are retained on-line for at least one month. During this period, such logs are secured such that they cannot be modified, and can be accessed only by authorized personnel. These logs are important for error correction, forensic auditing, security breach recovery, and related control efforts.

**Case Management**

Using DHHR-specific configurations, PCG’s AVS Web Portal can automatically queue specific case types to specific worker queues, ensuring workers only see those cases which are relevant to the specific worker. Cases can be “bucketed” by region, case type, IM consortia, office, unit, and/or worker, with only those workers assigned to that specific “bucket” having access to the cases within. Managers, administrators, and supervisors – based on assigned user roles – can still maintain access to all cases across multiple “buckets” or statewide.

	Request Date	Request Type	Case Type	HRI Size	Case Name	Case/Reg #	Assigned To	AVS Result	Case Status
<input type="checkbox"/>	04/12/2017	N	Application	2	CAROL BELL	CB38925	08	Over Resource - \$10,000.00	Pending Review
<input type="checkbox"/>	04/12/2017	N	Application	2	SHIRLEY KING	SK834381	jr001	Over Resource - \$10,000.00	Pending Review
<input type="checkbox"/>	07/17/2016	H	Application	2	TIG ANDREWS	TA2323		Over Resource - \$10,748.00	Pending Review
<input type="checkbox"/>	03/15/2016	N	Application	1	TODD JORDAN	MAV512		Over Resource - \$19,855.22	Pending Review
<input type="checkbox"/>	03/10/2016	O	Application	2	ALEX GREENIE	221163		Over Resource - \$12,455.02	Pending Review
<input type="checkbox"/>	02/25/2016	C	Application	2	REGAN FISHER	221133	kpowers	Over Resource - \$18,481.00	Pending Review
<input type="checkbox"/>	02/22/2016	N	Renewal	1	SERENA DOUBLEDAY	AVS221123	kpowers	Over Resource - \$3,740.00	Pending Review
<input type="checkbox"/>	02/22/2016	C	Renewal	1	MAX DRIBOH	AVS221124	kpowers	Over Resource - \$387.22	Pending Review

Case Queue

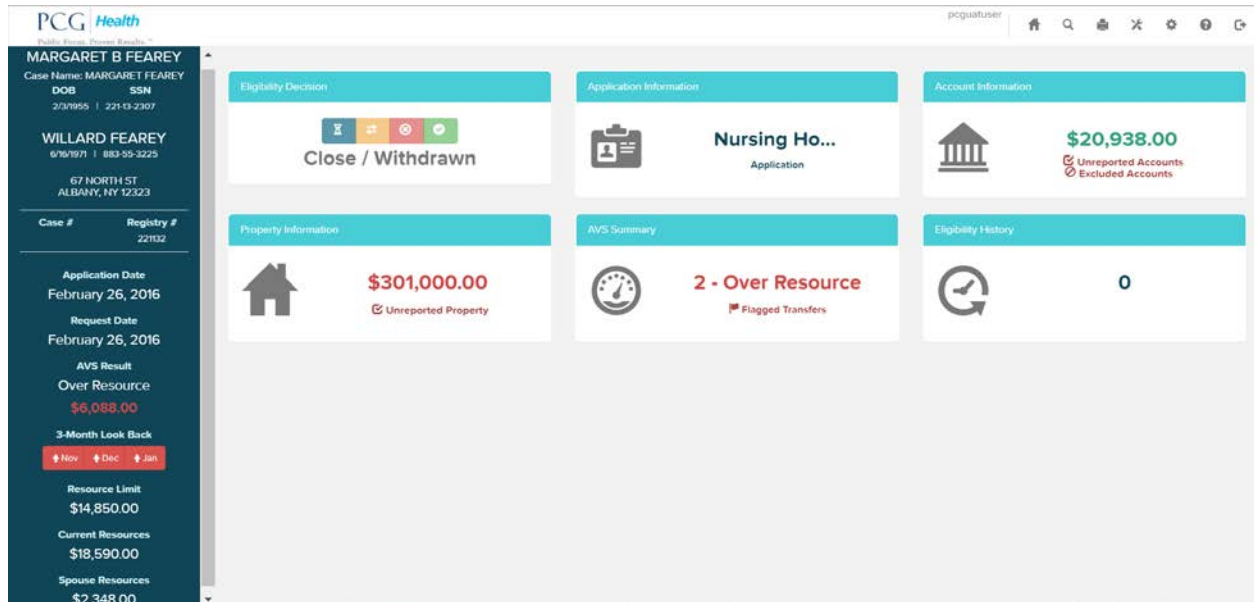
From the Case Queue page, users can also:

- Case Queue Functions**
- Sort cases by Request Date, Request Type, Case Name, Worker, AVS Result (i.e. over or under resources), and Case Status (i.e. Pending Review, Review in Progress, etc.) by clicking column headers once
- Filter cases by AVS Result, Case Status, Request Type, Worker, or any combination
- Edit Cases
- Decision/close cases
- Assign cases

Upon selecting a case, users are taken to a specific Case Dashboard, which summarizes key case information and the AVS results, including:

<b>Case Dashboard's Key Information</b>	
<b>Eligibility Decision</b>	Whether case is pending review, in progress, or decided/closed
<b>Application Information</b>	Case type and whether case is a new application or a renewal
<b>Account Information</b>	Total countable resources and unreported and/or excluded account flags, if applicable
<b>Property Information (Optional PCG Service)</b>	Total current market value of all currently owned real estate and any flagged unreported property.
<b>AVS Summary</b>	Risk of ineligibility and any flagged potentially disqualifying asset transfers
<b>Eligibility History</b>	Number of historical cases
<b>Resource Limit</b>	Asset limit specific to case
<b>Three-Month Look Back</b>	Indication of whether consumer was over or under resources during the 3 months prior to the application month

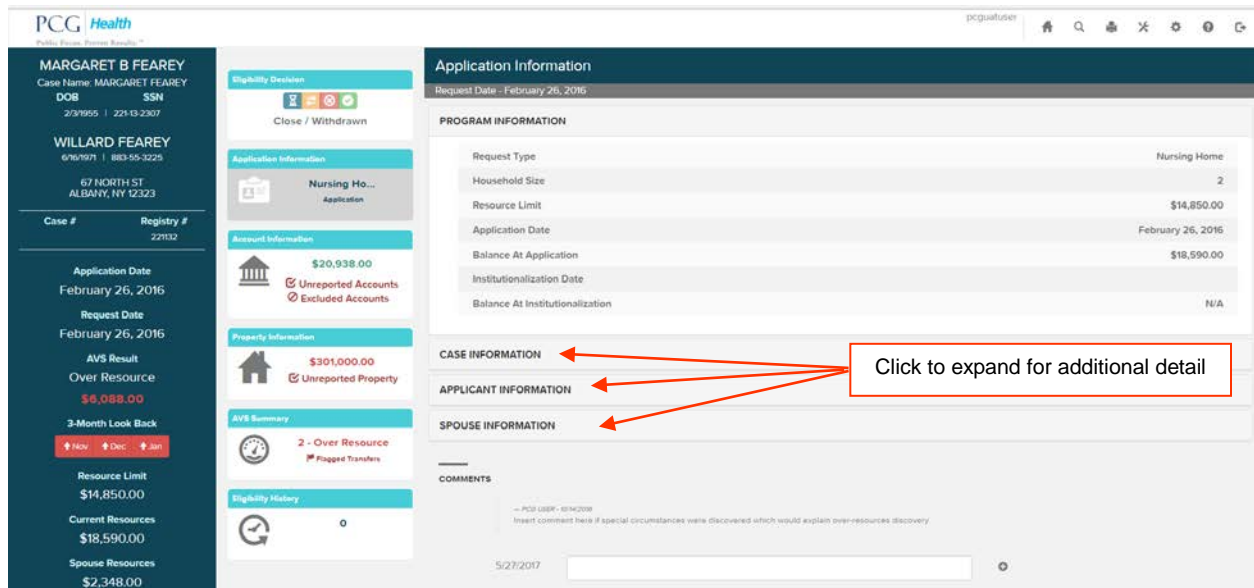
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Case Dashboard

The case dashboard provides quick, actionable summary case intelligence to the worker while allowing them to click on any of the square tiles for additional, detailed information.

Case information is available via the Application Information tile and includes all demographic case information for the applicant/beneficiary, as well as spousal information, if applicable. Additionally, workers can leave comments here for subsequent years' reviews.



Application Information

Users are able to view detailed AVS results both by account and by total monthly balance. On the following page, a screen shot has been include illustrating the "Month View" section of the Portal which lists the total balance of all accounts, and the individual account balances comprising each total monthly balance. On the next page, another screen shot has been included illustrating the "Account View" section

of the Portal, which lists each discovered account and allows the user to expand each account to review each monthly balance.

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**Account Information**

Account View | Month View

**Toggle between Account and Month views**

**ACCOUNT INFORMATION**

5 Accounts Found

**COUNTABLE ACCOUNTS**

Feb 2016 **\$20,938.00**

**Δ Collapse/Expand for Details ▾**

Bank Balances By Month

Bank	Account Type	Account #	Account Owner	Balance
SANTANDER BANK	Rent Security	621662000173	MARGARET	\$14,570.00
SANTANDER BANK	Custodial Other	925010174	MARGARET	\$4,020.00
US BANK	Checking Account	11232232	WILLARD FEAREY	\$2,348.00

Jan 2016 **\$33,872.00**

Dec 2015 **\$34,134.45**

Nov 2015 **\$31,975.00**

Oct 2015 **\$34,298.00**

Sep 2015 **\$33,517.00**

Aug 2015 **\$33,776.00**

AVS Portal "Account View" Page

**PCG Health**  
Public Focus. Proven Results.™

**MARGARET B FEAREY**  
Case Name: MARGARET FEAREY  
DOB: 2/3/1966 | SSN: 221-13-2307

**WILLARD FEAREY**  
DOB: 6/16/1971 | SSN: 883-55-3226  
67 NORTH ST  
ALBANY, NY 12323

Case # 221132 | Registry # 221132

Application Date: February 26, 2016  
Request Date: February 26, 2016  
AVS Result: Over Resource  
**\$6,088.00**

3-Month Look Back: Nov, Dec, Jan

Resource Limit: \$14,850.00  
Current Resources: \$18,590.00  
Spouse Resources: \$2,348.00

**Eligibility Decision: Pending Review**

**Application Information: Nursing Home Application**

**Account Information: \$20,938.00**  
Unreported, Excluded

**Property Information: \$301,000.00**

**AVS Summary: 2 - Over Resource**  
Flagged Transfers

**Eligibility History: 0**

**Account Information**  
5 Accounts Found

Account View | Month View

**Toggle between Account and Month views**

**COUNTABLE ACCOUNTS**

Accounts included in the resource calculation

Account Owner: MARGARET B FEAREY  
**SANTANDER BANK - (621662000173)**  
68 MAIN STREET, ALBANY, NY 12202  
Balance as of February 2016 - **\$14,570.00**  
Rent Security  
Refresh Date: February 27, 2016

Account Owner: MARGARET B FEAREY  
**SANTANDER BANK - (925010174)**  
68 MAIN STREET, ALBANY, NY 12202  
Balance as of February 2016 - **\$4,020.00**  
Custodial Other  
Refresh Date: February 27, 2016

Account Owner: WILLARD FEAREY  
**US BANK - (11232232)**  
115 Broadway, New York, NY 10039  
Balance as of February 2016 - **\$2,348.00**  
Checking Account  
Refresh Date: March 22, 2016

**EXCLUDED ACCOUNTS**

Accounts excluded in the resource calculation

Account Owner: MARGARET B FEAREY  
**SANTANDER BANK - (0099662000173)**  
108 SOUTH STREET, ALBANY, NY 12202  
Balance as of February 2016 - **\$14,570.00**  
IRA  
Refresh Date: February 27, 2016

Account Owner: MARGARET B FEAREY  
**SANTANDER BANK - (982735675100174)**  
108 SOUTH STREET, ALBANY, NY 12202  
Balance as of February 2016 - **\$4,020.00**  
Burial Funeral  
Refresh Date: February 27, 2016

**Δ Collapse/Expand for Details**

AVS Portal "Month View" Page

PCG will return the following financial institution data elements within the Portal:

Data Element	Description
Resource Limit	PCG will display the resource limit associated with the case.
Current Resources	PCG will calculate the total current account balances discovered for the applicant/beneficiary and spouse (if applicable).
Spouse Resources	PCG will identify the dollar value of resource which can be attributed to spouse-only accounts.
Discovered Resources vs. Program Limits	PCG will calculate the total current account balances discovered for the applicant/beneficiary and spouse (if applicable), compare this total to the applicable program limit, and display the result.
Discovered Resources vs. Program Limits for 3 Months Prior to Application Date Month	PCG will calculate the total current account balances discovered for the applicant/beneficiary and spouse (if applicable) for each of the 3 months prior to the application month, compare this total to the applicable program limit, and display the result in the form of an up or down arrow.
Account Owner(s)	For each account discovered, PCG will identify each account owner associated with the account.
Financial Institution	For each account discovered, PCG will identify the financial institution where the account is maintained.
Financial Institution Branch Address	For each account discovered, PCG will identify the financial institution branch address where the account is maintained.
Account Number	For each account discovered, PCG will identify the account number.
First Minute-of-Month Account Balances	For each account discovered, PCG will identify the account balance as of the first minute of the month for each month of the 60 month look-back period.

PCG will return the following property data elements within the Portal:

Data Element	Description
Owned Property Address(es)	Address(es) of currently owned properties.
Owned Property Owner(s)	Owner name(s) of currently owned properties.
Owned Property Assessed Value(s)	Current assessed value of the land plus improvements, before exemptions.
Owned Property Market Value(s)	Current market value of the land plus improvements, before exemptions.
Owned Property Tax Year(s)	Tax assessment year(s).
Owned Property Purchase Date(s)	Date currently owned properties were purchased.
Owned Property Purchase Price(s)	Purchase price of currently owned properties.



Data Element	Description
Currently Owned Flag	Flag indicating that consumer currently owns property at address indicated.
Sold Property Address(es)	Address(es) of any properties sold within previous 60 months.
Sold Property Sale Date(s)	Date of sale of any properties sold within previous 60 months.
Sold Property Sale Amount(s)	Sale price of any properties sold within previous 60 months.
Sold Property Owner(s)	Name of purchaser(s) of any properties sold within previous 60 months.
Sold Property Deed Type(s)	Type of deed associated with sale of any properties sold within previous 60 months.

PCG’s AVS Portal includes a number of analytics and flags to alert your workers to potentially disqualifying applicant/beneficiary behaviors. These flags include:

Flag	Description
Results vs. Program Limits	During the requirements definition phase of this engagement, PCG will work with the agency to match program limits to each request type + household size variation each agency will be sending to the AVS.
Countable Liquid Assets and Property	PCG can exclude certain account types and/or property from being included in the calculation of applicant/beneficiary resources across all requests or based on the request type variation. For example, several of PCG’s state clients exclude IRA and Burial Fund account balances from being included in the calculation of an applicant/beneficiary’s current resources.
Flagged Account Resource Transfers	PCG will identify and flag any accounts and the month the account increased or decreased significantly (value is configurable) in any of the 60 months prior to application.
Flagged Total Account Transfers	PCG will identify and flag any months where the total balance across all owned accounts increased or decreased significantly (value is configurable) in any of the 60 months prior to application.
Disqualifying Property Transfer	PCG’s AVS automatically identifies and flags potentially disqualifying properties sold for less than 80 percent (configurable) of market value prior to application. PCG can configure these flags based on State-defined “strength” thresholds.
Undisclosed Account Flag	PCG’s Portal allows DHHR workers to indicate whether an account in the Portal was previously unknown to the worker. Reporting options allow authorized user roles to generate reports showing all cases with undisclosed accounts.
Undisclosed Property Flag	PCG’s AVS can automatically identify and flag those properties which were previously undisclosed by the applicant/beneficiary provided the State can include this information in the request sent to PCG.
Spouse Assets Impacting Resource Calculations	PCG’s AVS combines spouse cases when appropriate to ensure that all countable spouse assets are included in the calculation of resources.

Flag	Description
Risk Score	PCG's AVS includes configurable business rules which allow us to quantify the level of risk of ineligibility and/or fraud each applicant or beneficiary represents to the State based, primarily, on the value of their discovered resources vs. program limits and, secondarily, on the results of the other analytics listed above.

These flags are captured and displayed within PCG "AVS Summary" dashboard. All flags can be configured and/or excluded from the Portal, at the State's request. Within the screen below, you will note that this client's "risk score" is simply a "1" or a "2" based on whether the applicant was over or under program limits. PCG can add additional criteria to expand risk scoring to more specifically quantify the overall risk of ineligibility each case presents.

The screenshot displays the AVS Summary page for Margaret B Fearey. On the left, a sidebar shows case details for MARGARET B FEAREY (DOB: 2/3/1955, SSN: 22143-2307) and WILLARD FEAREY (DOB: 6/6/1971, SSN: 883-96-3225). The AVS Result is 'Over Resource' with a value of \$6,088.00. The main content area shows a 'Case Summary Score' of 2, 'Over Resource'. A table lists 'Summary Score' and 'Summary Reason':

Summary Score	Summary Reason
1	Under Resources
2	Over Resources

Below this are sections for 'FLAGGED ACCOUNT RESOURCE TRANSFERS', 'FLAGGED TOTAL ACCOUNT TRANSFERS', 'FLAGGED PROPERTY TRANSFERS', and 'FLAGGED DEEDS'. A red box highlights a button labeled 'Collapse/Expand for Details'.

AVS Summary Page

PCG's AVS Portal allows authorized user roles to submit ad hoc AVS requests from within the Portal by inputting basic demographic case information. Once submitted, ad hoc requests are integrated into the same case and results processing workflow as those AVS requests submitted via batch or web services.

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*Ad Hoc AVS Request Submission*

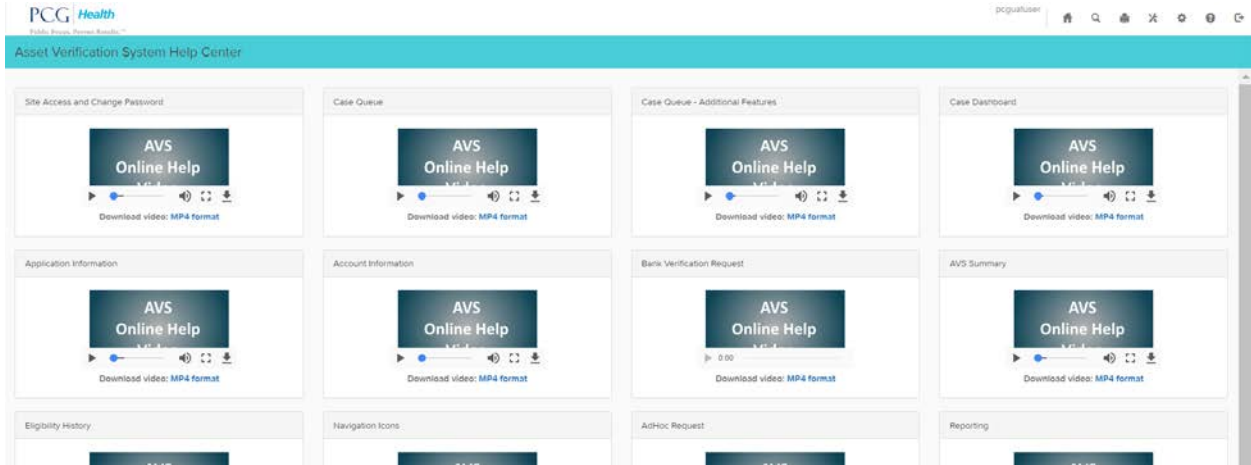
PCG's AVS Web Portal features a number of additional features, including:

- **Management Reporting Dashboard:** Allows users to generate customized summary and detail-level reports based on any combination of user-selected criteria (e.g. date range, AVS results, county, etc.).

Request Date	Case Number	Reg #	Name	Case Status	App Date	District / Office / Unit / Worker
07/24/2015	MAV321	810019	JOHN JACOB	DEBTOR/EL	07/24/2015	01 / / /
12/09/2015	MAV324	810019	ALISHA	PENDING REVIEW	12/09/2015	66 / / /
12/09/2015	AS	11111111	AS	PENDING REVIEW	12/09/2015	66 / / /
12/09/2015	MAV320	818123	AMY BARTEL	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV318	898123	JENNIFER FINE	PROCESSING	12/09/2015	01 / / /
12/09/2015	MAV316	848123	MEAGHAN TYLER	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV317	818123	JASON HANSON	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV315	868123	TOBY ROGERS	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV314	878123	TONI CRUISE	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV314	818123	CATHY CONLEY	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV312	891233	NICOLE BERNICE	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV312	106123	RHONDA BALDWIN	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV311	818123	TREVOR KELLY	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV310	818123	JULIE DAVIS	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV305	111311	GEORGE TUCKER	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	MAV301	818923	STEPHANIE AMHER	PENDING REVIEW	12/09/2015	07 / / /
12/09/2015	MAV301	898113	KAREN DOUBLEDAY	PROCESSING	12/09/2015	01 / / /
12/09/2015	MAV300	898123	AMBER SMITH	PROCESSING	12/09/2015	01 / / /
12/09/2015	MAV300	848123	ALEXIA HINGES	PENDING REVIEW	12/09/2015	01 / / / Show
12/09/2015	MAV300	818123	PETER MARTIN	PENDING REVIEW	12/09/2015	01 / / / Show
12/09/2015	MAV300	868123	JULIE SEBASTIAN	PENDING REVIEW	12/09/2015	01 / / / Show
12/09/2015	MAV300	879123	CHILSON POPE	PENDING REVIEW	12/09/2015	01 / / / Show
12/09/2015	MAV300	848123	MELIE KRUGER	PENDING REVIEW	12/09/2015	01 / / / W/Unit 17
12/09/2015	MAV300	871233	RUBY BRITNEY	PENDING REVIEW	12/09/2015	01 / / /
12/09/2015	PA399301	01020118	PO PP	PENDING REVIEW	12/09/2015	01 / / / Show
12/11/2015	MAV300	898123	JAKE SMITH	PENDING REVIEW	12/11/2015	01 / / / Show
12/11/2015	MAV301	8481231	SAMANTHA TYLER	PENDING REVIEW	12/11/2015	01 / / / Show
12/11/2015	MAV301	848123	JAMINIE KRUGER	PENDING REVIEW	12/11/2015	01 / / /
12/11/2015	MAV301	879123	JOSEPH POPE	PENDING REVIEW	12/11/2015	01 / / / Show
12/11/2015	MAV300	839723	RAY SEBASTIAN	PENDING REVIEW	12/11/2015	01 / / / Show
12/11/2015	MAV300	839723	BEV SEBASTIAN	PROCESSING	12/11/2015	01 / / /

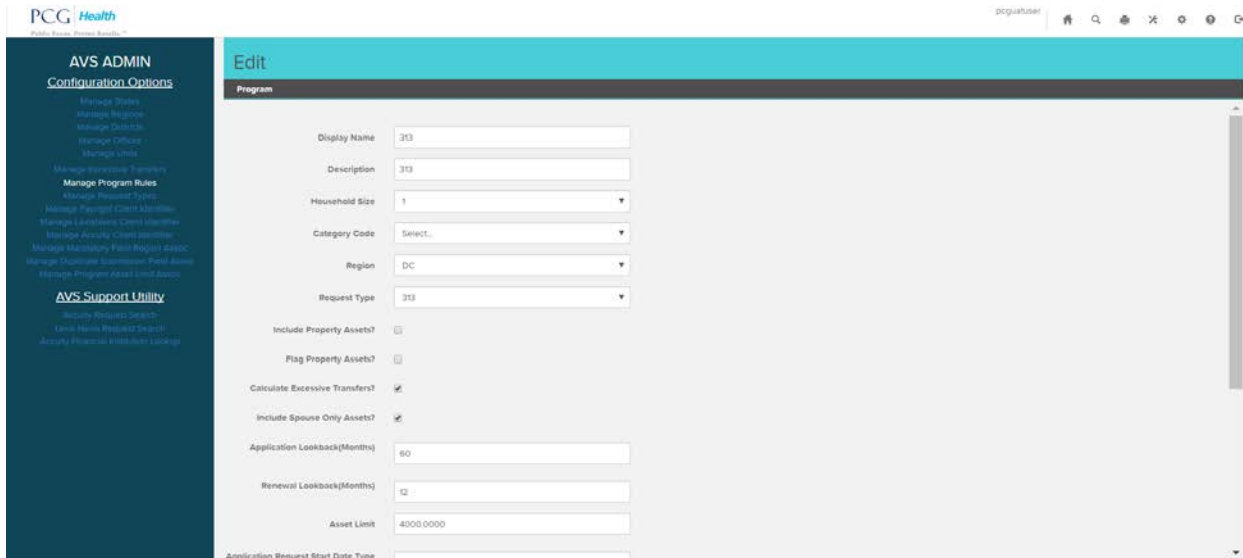
*Reporting Dashboard*

- **Help Dashboard:** Contains dozens of help videos and instructional materials for using the Portal and interpreting AVS results. State-specific materials can be added to this section.



Help Dashboard

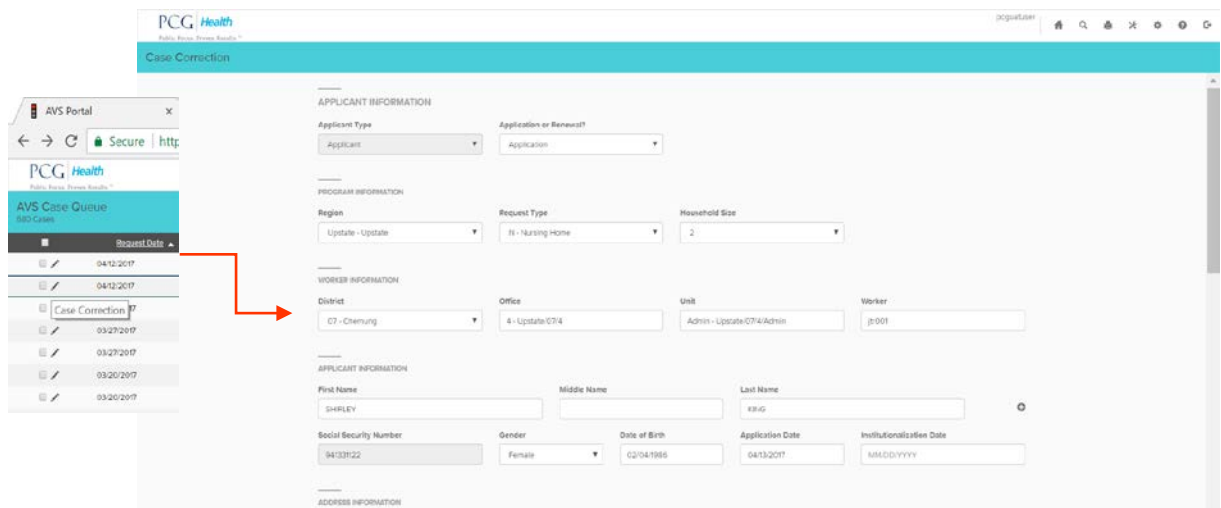
- **Configurator:** Allows for instantaneous updates to Portal business rules, including resource limits, request types, flags, excluded account types, look-back periods, and much more.



AVS Web Portal Configurator

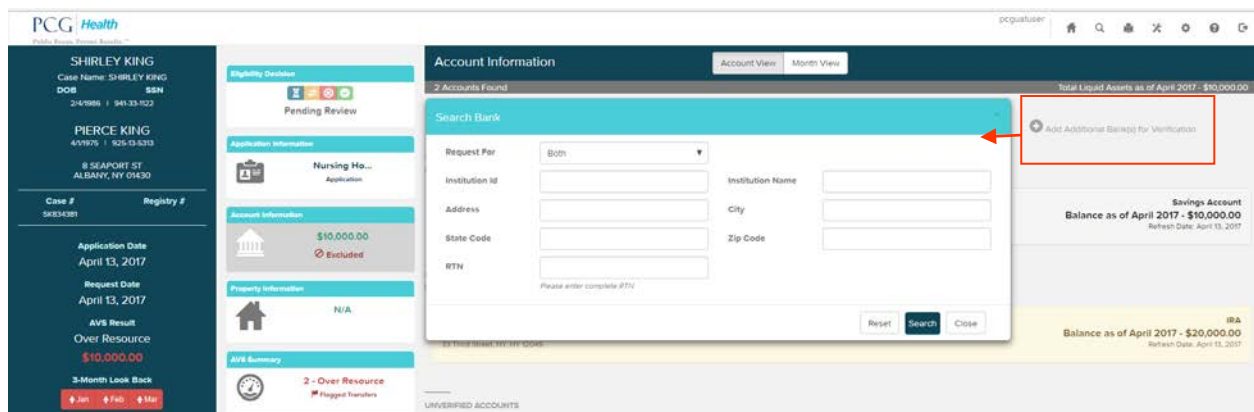
- **Case Correction/Update Functionality:** PCG’s AVS Web Portal can be updated via either batch file submissions with updated case information or via the Case Correction tool in the Portal.

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*AVS Web Portal Case Correction Tool*

- **Bank Verification Request Tool:** PCG’s AVS allows DHHR workers to request data from any financial institution in the United States via our Bank Verification Request Tool. This ensures that any and all disclosed or undisclosed bank accounts can be electronically queried by your workers, avoiding the need to collect physical bank statements. Banks can be searched by any combination of bank name, institution ID, address, state, RTN, zip code, and more. PCG updates this service on a monthly basis with a new bank file to account for any changes in the banks’ ownership structure.



*Bank Verification Request Tool*

PCG’s AVS Web Portal is designed to be completely configurable to allow our clients to not only easily add new verification data sources (e.g. identity, property, income, residency, household composition, etc.), but also to quickly incorporate additional or changing business rules and/or flags reflecting new data requirements and/or changing program limits.

PCG would be pleased to present a detailed demonstration of our AVS Web Portal upon request.

PCG’s AVS Web Portal typically takes 60 days to deploy but this is contingent on the State signing off on Portal configuration requirements by day 15 following award. PCG agrees to pursue December 31, 2017 deployment vigorously but cannot guarantee this timeline due to the lack of a contract at the time of this writing.

PCG’s proposed AVS Web Portal does not comply with the following requirements requested by the RFQ:

- Monthly Response Analysis Tool: PCG agrees to mitigate this by delivering a Monthly Response Analysis Report to the State identifying all slow and/or unresponsive financial institutions.
- Format and Content: PCG’s AVS Web Portal is similar to “software as a service” and is being utilized by 8 states currently. PCG configures our Portal for each of our AVS clients to reflect State-specific program limits, resource calculations, and automated flagging based on State policy, but DHHR will not have the flexibility to modify our Portal beyond these State-specific configurations.

## 2.2 AVS Services Interface

PCG’s proposed AVS will accommodate the real-time exchange of data from agencies via either SOAP or REST web services calls. PCG’s AVS incorporates a modular system design utilizing a Service Oriented Architecture (SOA) approach with processing modules developed in a separate Web service application programming interface (API) layer. PCG’s Web service API layer will provide a secure gateway to processing for invoking AVS processing.

PCG hosts an industry-standard web service available in either SOAP or REST, which is currently in use by multiple Medicaid agencies around the United States in the performance of asset verification services. PCG can also customize our XSD to allow for DHHR-prescribed formatting, at the State’s request. PCG’s AVS request service allows agencies to create interfaces within your eligibility system to submit real-time requests and receive request acknowledgments and error messaging.

PCG’s AVS integration is supported by two web services:

**1** **RequestService**, hosted by PCG, is a web service that allows the transmission of information about a person so that PCG is able to initiate a search of national, regional, local participating financial institutions in order to discover both disclosed and undisclosed assets. PCG’s RequestService will return an acknowledgment synchronously when this service is called.

Critical data elements within PCG’s Request XSD include:

- ✓ Unique client request ID;
- ✓ Social Security Number;
- ✓ Name;
- ✓ Address;
- ✓ Date of birth; and
- ✓ Look-back period.

PCG web service accommodates bundles of multiple AVS requests. If the request is accepted by PCG, a successful acknowledgement is sent to the agency. If there is a problem that prevents the entire file from being accepted, then a failure acknowledgement is sent to the agency. Lastly, if there is a problem with a specific request bundle, then that entire bundle of requests will be rejected, and all other successful bundles accepted. Even though errors are reported at the request level, the transaction is at the bundle level—so a failure in one request means that none of the requests in the bundle were accepted.

The table below summarizes the structure of the PCG’s Request XSD. Not all elements are listed.

Element Name	Element Type	Notes/Requirements
assetVerificationRequest	AssetVerificationRequestType	One per file. Encloses an unbounded list of request bundles.

Element Name	Element Type	Notes/Requirements
agencySystemId	string	One per file. Identifies the Agency. Constant value assigned by Accuity to each Agency.
transmittalId	string	One per file. Should be the next number in a sequence. Each file sent by the Agency shall have a unique transmittal ID.
transmittalTimestamp	dateTime	Date/time when the XML file was created and transferred to Accuity.
requestBundle	RequestBundleType	Repeated for each Subject and Case ID. Encloses several Verification Requests, and optionally a Detection Request. There must be at least one request (of either type) per bundle.
bundleId	string	Unique ID of the "requestBundle" element. Should be the next number in a sequence, unique across all transmissions. Used for correlation of errors if there are validation problems above the level of an individual request.
requestDate	dateTime	Timestamp when the request was created.
fieldOfficeCode	string	Identifies the field office. Required to be a value that has been configured in Accuity's system.
caseId	string	Identifies the Case that is associated with all requests in the enclosing "requestBundle" element.
requestor	RequestorType	Name of the person who created the requests.
subject	PersonType	Name, Address, SSN of the person under investigation. Optionally includes up to 5 alternate names, which are required if the person's name has been changed or if the person uses more than one name.
verificationRequest	VerificationRequestType	Zero or more may be contained in each bundle. Identifies a specific institution and date range(s).
detectionRequest	DetectionRequestType	Enables a search for institutions not listed using a "verificationRequest". Zero or one of these per bundle. May include geographic radial search.
guardAddress	AddressType	Address included in the detectionRequest, used for performing geographic radial account detection (GUARD). For best results, address cleansing should be performed by the Agency in advance of submitting the request.
clientRequestId	string	A unique identifier for either a Verification or Account Detection Request. Should be the next number in a sequence, generated by the Agency. Must be unique across all requests. Used for correlation of requests to responses, and for correlation of requests to errors.
financialInstitution	FinancialInstitutionType	One per "verificationRequest" element. Identifies an institution using either an ABA number (routing number) or a location/institution

Element Name	Element Type	Notes/Requirements
		identifier.
account	AccountDetailsType	Zero or more per "verificationRequest". This element provides the account number and joint-account indicator (a true/false value) for each alleged account.
interestInfoRequested	boolean	True or false, depending on whether or not the FI should provide interest amounts in the response.
dateRange	DateRangeType	A beginning month and year, and an end month and year. Defines the range for which balance/interest values may be provided in the response. The request may include multiple date ranges, but they must not overlap and the start date must be earlier (or the same) as the end date. The range is inclusive—for example: 2012-01 to 2012-03 is a request for January, February, and March.
remarks	string	Optional text, associated with either the verificationRequest or detectionRequest, that is presented to the FI.

The listing below provides an example (hypothetical) file, which contains two bundles of requests.

```
<?xml version="1.0" encoding="UTF-8"?>
<req:assetVerificationRequest
xmlns:req="https://avs.pcgus.com.com/v1.0.0/assetVerification/request">
  <req:agencySystemId>ExampleSysId</req:agencySystemId>
  <req:transmittalId>1</req:transmittalId>
  <req:transmittalTimestamp>2012-03-20T18:17:44.058-06:00</req:transmittalTimestamp>
  <!--1 or more repetitions:-->
  <req:requestBundle>
    <req:bundleId>1</req:bundleId>
    <req:requestDate>2012-03-20T11:05:00.050-06:00</req:requestDate>
    <req:fieldOfficeCode>FL001</req:fieldOfficeCode>
    <req:caseId>201</req:caseId>
    <req:requestor>
      <req:requestorName>
        <req:firstName>Jason</req:firstName>
        <!--Optional:-->
        <req:middleName>Lance</req:middleName>
        <req:lastName>Jones</req:lastName>
        <!--Optional:-->
        <req:suffix>II</req:suffix>
      </req:requestorName>
    </req:requestor>
    <req:subject>
      <req:primaryName>
        <req:firstName>Joseph</req:firstName>
        <!--Optional:-->
        <req:middleName>Tomas</req:middleName>
        <req:lastName>Smith</req:lastName>
```



```
</req:primaryName>
<!--0 to 5 repetitions:-->
<req:otherNames>
  <req:firstName>Joe</req:firstName>
  <!--Optional:-->
  <req:middleName>Tomas</req:middleName>
  <req:lastName>Smith</req:lastName>
</req:otherNames>
<req:ssn>555555555</req:ssn>
<!--Optional:-->
<req:residenceAddr>
  <req:address>123 Main St.</req:address>
  <req:city>Sometown</req:city>
  <req:state>FL</req:state>
  <req:zip5>12345</req:zip5>
  <!--Optional:-->
  <req:zip4>1234</req:zip4>
</req:residenceAddr>
</req:subject>
<!--Zero or more repetitions:-->
<req:verificationRequest>
  <req:clientRequestId>2</req:clientRequestId>
  <req:financialInstitution>
    <req:locationId>3459872</req:locationId>
    <req:institutionId>1298573</req:institutionId>
  </req:financialInstitution>
  <!--Zero or more repetitions:-->
  <req:account>
    <req:accountNumber>0001234</req:accountNumber>
    <!--Optional:-->
    <req:jointAccount>true</req:jointAccount>
  </req:account>
  <req:interestInfoRequested>true</req:interestInfoRequested>
  <!--1 or more repetitions:-->
  <req:dateRange>
    <req:startDate>2011-01</req:startDate>
    <req:endDate>2011-04</req:endDate>
  </req:dateRange>
  <req:dateRange>
    <req:startDate>2012-02</req:startDate>
    <req:endDate>2012-04</req:endDate>
  </req:dateRange>
  <!--Optional:-->
  <req:remarks>Text field containing remarks that were entered by the requestor.</req:remarks>
</req:verificationRequest>
<!--Optional:-->
<req:detectionRequest>
  <req:clientRequestId>3</req:clientRequestId>
  <!--Optional:-->
  <req:guardAddress>
    <req:address>123 Main St.</req:address>
    <req:city>Sometown</req:city>
    <req:state>MA</req:state>
    <req:zip5>12345</req:zip5>
```

```
<!--Optional:-->
  <req:zip4>1234</req:zip4>
</req:guardAddress>
<!--1 or more repetitions:-->
<req:dateRange>
  <req:startDate>2012-01</req:startDate>
  <req:endDate>2012-05</req:endDate>
</req:dateRange>
<!--Optional:-->
  <req:remarks>Remarks associated requests created during account detection.</req:remarks>
</req:detectionRequest>
</req:requestBundle>
<req:requestBundle>
  <req:bundleId>4</req:bundleId>
  <req:requestDate>2012-03-20T11:05:10.050-06:00</req:requestDate>
  <req:fieldOfficeCode>FL001</req:fieldOfficeCode>
  <req:caselId>202</req:caselId>
  <req:requestor>
    <req:requestorName>
      <req:firstName>Jason</req:firstName>
      <!--Optional:-->
      <req:middleName>Lance</req:middleName>
      <req:lastName>Jones</req:lastName>
      <!--Optional:-->
      <req:suffix>II</req:suffix>
    </req:requestorName>
  </req:requestor>
  <req:subject>
    <req:primaryName>
      <req:firstName>William</req:firstName>
      <!--Optional:-->
      <req:middleName>Paul</req:middleName>
      <req:lastName>Bartlett</req:lastName>
    </req:primaryName>
    <req:ssn>444444444</req:ssn>
    <!--Optional:-->
    <req:residenceAddr>
      <req:address>500 College Ave.</req:address>
      <req:city>Somecity</req:city>
      <req:state>IL</req:state>
      <req:zip5>65432</req:zip5>
      <!--Optional:-->
      <req:zip4>1000</req:zip4>
    </req:residenceAddr>
  </req:subject>
  <!--Zero or more repetitions:-->
  <req:verificationRequest>
    <req:clientRequestId>5</req:clientRequestId>
    <req:financialInstitution>
      <req:routingNumber>999999999</req:routingNumber>
    </req:financialInstitution>
    <!--Zero or more repetitions:-->
    <req:account>
      <req:accountNumber>65500</req:accountNumber>
```

```

<!--Optional-->
  <req:jointAccount>>false</req:jointAccount>
</req:account>
<req:account>
  <req:accountNumber>65501</req:accountNumber>
  <!--Optional-->
  <req:jointAccount>>false</req:jointAccount>
</req:account>
<req:interestInfoRequested>>false</req:interestInfoRequested>
<!--1 or more repetitions-->
<req:dateRange>
  <req:startDate>2012-01</req:startDate>
  <req:endDate>2012-05</req:endDate>
</req:dateRange>
</req:verificationRequest>
<req:detectionRequest>
  <req:clientRequestId>6</req:clientRequestId>
  <req:guardAddress>
    <req:address>123 Sesame St.</req:address>
    <req:city>Springfield</req:city>
    <req:state>IL</req:state>
    <req:zip5>60001</req:zip5>
    <req:zip4>1100</req:zip4>
  </req:guardAddress>
  <!--1 or more repetitions-->
  <req:dateRange>
    <req:startDate>2011-08</req:startDate>
    <req:endDate>2011-10</req:endDate>
  </req:dateRange>
</req:detectionRequest>
</req:requestBundle>
</req:assetVerificationRequest>

```

#### Example Request File

If the above example is entirely accepted by PCG, then the following successful acknowledgment is sent to the Agency:

```

<?xml version="1.0" encoding="UTF-8"?>
<req:assetVerificationRequestAck
xmlns:req="https://avs.pcgus.com/v1.0.0/assetVerification/requestAck">
  <req:agencySystemId>ExampleSysId</req:agencySystemId>
  <req:transmittalId>1</req:transmittalId>
  <req:status>SUCCESS</req:status>
</req:assetVerificationRequestAck>

```

#### Example Successful Request Acknowledgment

If there is a problem that prevents the entire file from being accepted, then the following is an example of a failure acknowledgment sent to the Agency:

```

<?xml version="1.0" encoding="UTF-8"?>
<req:assetVerificationRequestAck
xmlns:req="https://avs.pcgus.com/v1.0.0/assetVerification/requestAck">
  <req:agencySystemId>ExampleSysId</req:agencySystemId>
  <req:transmittalId>1</req:transmittalId>

```

```
<req:status>FAILURE</req:status>
<req:error>
  <req:reason>SCHEMA_VALIDATION</req:reason>
</req:error>
</req:assetVerificationRequestAck>
```

**Example Failure Request Acknowledgment**

Lastly, if there is a problem with a specific request bundle, then that entire bundle of requests will be rejected, and all other successful bundles accepted. Even though errors are reported at the request level, the transaction is at the bundle level—so a failure in one request means that none of the requests in the bundle were accepted.

```
<?xml version="1.0" encoding="UTF-8"?>
<req:assetVerificationRequestAck
xmlns:req="https://avs.pcgus.com/v1.0.0/assetVerification/requestAck">
  <req:agencySystemId>ExampleSysId</req:agencySystemId>
  <req:transmittalId>1</req:transmittalId>
  <req:status>PARTIAL</req:status>
  <req:error>
    <req:bundleId>4</req:bundleId>
    <req:reason>INVALID_FIELD_OFFICE</req:reason>
    <req:reasonDescription>Field office code is unknown</req:reasonDescription>
  </req:error>
  <req:error>
    <req:bundleId>4</req:bundleId>
    <req:clientRequestId>5</req:clientRequestId>
    <req:reason>FI_NOT_FOUND</req:reason>
  </req:error>
</req:assetVerificationRequestAck>
```

**Example Partial Success Request Acknowledgment**

**2** **ResponseService**, hosted by either PCG (pull service) or the agency (push service), is the service that allows response data from financial institutions to be delivered by PCG’s AVS back to the agency. Request Identifiers embedded within the response data will allow the agency to correlate the response data with the original request. Responses may contain: account, account owner(s), and balance information, an indication that no accounts were found, or a “will not respond” message with an accompanying explanation. There may be multiple responses including the responses from multiple financial institutions for each unique request submitted to PCG. An acknowledgment will be returned synchronously when this service is called.

Critical data elements within PCG’s response XSD include:

- ✓ Unique client request ID (used to map the response to the request);
- ✓ Social Security Number;
- ✓ Financial institution;
- ✓ Financial institution address;
- ✓ Account open and close date(s);
- ✓ Account type;
- ✓ Account owner(s);
- ✓ Account number;
- ✓ Account balance;
- ✓ Property location information (current and prior);
- ✓ Owner/co-owner names;
- ✓ Seller(s) names;

- ✓ Transaction dates;
- ✓ Value: purchased price, sales price, assessments, mortgage/loan amount, market value;
- ✓ Deed type (quitclaim, interfamily transfer, etc.); and
- ✓ Number of properties owned.

The table below summarizes the structure of the PCG’s Response XSD. Not all elements are listed.

Element Name	Element Type	Notes/Requirements
assetVerificationResponse	AssetVerificationResponseType	One per file. Encloses an unbounded list of “response” elements.
agencySystemId	string	The same value that was provided in the corresponding request.
transmittalId	string	One per file. Should be the next number in a sequence. Each file sent by Accuity shall have a unique transmittal ID.
transmittalTimestamp	dateTime	Date/time when the XML file was created and transferred to the Agency.
response	ResponseType	One or more per file. Each response corresponds to either a Verification Request or a Detection Request. Each Detection Request can result in zero or more responses. Responses to any particular Detection Request are typically scattered across different transmittals, because different FIs respond at different times.
clientRequestId	string	The value of the correlation ID that was originally provided in the request.
requestId	string	The ID of the Request in Accuity’s system. Unique for each response.
responseIndicator	boolean	True unless the FI has indicated “Will Not Respond”.
nonResponseReasonCode	enumeration	Reason why the FI used “Will Not Respond”
accounts	AccountType	Zero or more accounts, each with: an account number, account title, account type, and list of balance/interest values.
financialInstitution	FinancialInstitutionType	Identifies the institution’s central processor that provided the response.
remarks	string	The remarks from the FI. Can include open/close dates, details if OTHER is used as the “Will Not Respond” reason, or other information.
jointAccount	boolean	One per AccountType. True if the FI reported that the account was a joint account.
accountNumber	string	One per AccountType. The Account Number, as reported by the FI.
accountTypeCode	enumeration	The type of account (or “OTHER” if no types in the list are applicable) as reported by the FI.
accountTypeDesc	string	Zero or One per AccountType. Description, provided by the FI, of the account type.

Element Name	Element Type	Notes/Requirements
		Required if the accountTypeCode is OTHER.
title	string	One per AccountType. The title of the account, as provided by the FI.
balance	AccountBalanceType	One or more per AccountType. Each contains a month/year and a balance dollar amount. A dollar amount for interest may be provided if the response is for a Verification Request where interest was requested.
locationId	string	The Accuity (TFPSYS) identifier of the Central Processor that responded to the request.
institutionId	string	The Accuity (TFPSYS) identifier of the institution.
institutionName	string	The name of the responding institution.
headOfficeAddress	AddressType	The address of the responding institution's head office.

What follows is an example of our response XSD:

```
<?xml version="1.0" encoding="UTF-8"?>
<res:assetVerificationResponse xmlns:res="https://avs.pcgus.com/v1.0.0/assetVerification/response">
  <res:agencySystemId>ExampleSysId</res:agencySystemId>
  <res:transmittalId>1540</res:transmittalId>
  <res:transmittalTimestamp>2012-03-21T18:15:34.021-06:00</res:transmittalTimestamp>
  <!--1 or more repetitions:-->
  <res:response>
    <res:clientRequestId>2</res:clientRequestId>
    <res:requestId>6000</res:requestId>
    <res:responseIndicator>true</res:responseIndicator>
    <!--Zero or more repetitions:-->
    <res:accounts>
      <!--Optional:-->
      <res:jointAccount>true</res:jointAccount>
      <res:accountNumber>1234</res:accountNumber>
      <res:accountTypeCode>CHECKING</res:accountTypeCode>
      <res:title>Names of account holders listed here</res:title>
      <!--1 or more repetitions:-->
      <res:balance>
        <res:date>2011-01</res:date>
        <res:value>20.00</res:value>
        <res:interest>0.03</res:interest>
      </res:balance>
      <res:balance>
        <res:date>2011-02</res:date>
        <res:value>20.00</res:value>
        <res:interest>0.03</res:interest>
      </res:balance>
      <res:balance>
```

```

    <res:date>2011-03</res:date>
    <res:value>20.00</res:value>
    <res:interest>0.03</res:interest>
  </res:balance>
  <res:balance>
    <res:date>2011-04</res:date>
    <res:value>20.00</res:value>
    <res:interest>0.03</res:interest>
  </res:balance>
  <res:balance>
    <res:date>2012-02</res:date>
    <res:value>-10.00</res:value>
    <res:interest>0.00</res:interest>
  </res:balance>
  <res:balance>
    <res:date>2012-03</res:date>
    <res:value>250.50</res:value>
    <res:interest>2.51</res:interest>
  </res:balance>
</res:accounts>
<res:financialInstitution>
  <res:locationId>3460000</res:locationId>
  <res:institutionId>1298573</res:institutionId>
  <res:institutionName>Example Institution Name</res:institutionName>
  <res:headOfficeAddress>
    <res:addressLine1>123 Bank St.</res:addressLine1>
    <res:city>Example City</res:city>
    <res:state>FL</res:state>
    <res:zip5>55555</res:zip5>
    <res:zip4>4444</res:zip4>
  </res:headOfficeAddress>
</res:financialInstitution>
<!--Optional-->
  <res:remarks>Account was closed 04/2012</res:remarks>
</res:response>
<res:response>
  <res:clientRequestId>3</res:clientRequestId>
  <res:requestId>6001</res:requestId>
  <res:responseIndicator>>false</res:responseIndicator>
  <res:nonResponseReasonCode>INCORRECT_NAME</res:nonResponseReasonCode>
  <res:financialInstitution>
    <res:locationId>4357979</res:locationId>
    <res:institutionId>2349876</res:institutionId>
    <res:institutionName>Second Example Institution</res:institutionName>
    <res:headOfficeAddress>
      <res:addressLine1>5000 E. Bank Ave.</res:addressLine1>
      <res:city>Example City</res:city>
      <res:state>FL</res:state>
      <res:zip5>55555</res:zip5>
      <res:zip4>4444</res:zip4>
    </res:headOfficeAddress>
  </res:financialInstitution>
  <res:remarks></res:remarks>
</res:response>

```

```

<res:response>
  <res:clientRequestId>3</res:clientRequestId>
  <res:requestId>6002</res:requestId>
  <res:responseIndicator>true</res:responseIndicator>
  <res:financialInstitution>
    <res:locationId>1297979</res:locationId>
    <res:institutionId>2348271</res:institutionId>
    <res:institutionName>Third Example Institution</res:institutionName>
    <res:headOfficeAddress>
      <res:addressLine1>1000 Main</res:addressLine1>
      <res:city>Example City</res:city>
      <res:state>FL</res:state>
      <res:zip5>55555</res:zip5>
      <res:zip4>4444</res:zip4>
    </res:headOfficeAddress>
  </res:financialInstitution>
  <res:remarks>No accounts were found</res:remarks>
</res:response>
<res:response>
  <res:clientRequestId>6</res:clientRequestId>
  <res:requestId>6003</res:requestId>
  <res:responseIndicator>true</res:responseIndicator>
  <res:accounts>
    <res:jointAccount>true</res:jointAccount>
    <res:accountNumber>87766</res:accountNumber>
    <res:accountTypeCode>OTHER</res:accountTypeCode>
    <res:accountTypeDesc>Special Account</res:accountTypeDesc>
    <res:title>Account Title</res:title>
    <res:balance>
      <res:date>2011-08</res:date>
      <res:value>234.20</res:value>
    </res:balance>
    <res:balance>
      <res:date>2011-09</res:date>
      <res:value>250.20</res:value>
    </res:balance>
    <res:balance>
      <res:date>2011-10</res:date>
      <res:value>431.20</res:value>
    </res:balance>
  </res:accounts>
  <res:accounts>
    <res:jointAccount>false</res:jointAccount>
    <res:accountNumber>023209B</res:accountNumber>
    <res:accountTypeCode>CD</res:accountTypeCode>
    <res:title>List of account holders</res:title>
    <res:balance>
      <res:date>2011-09</res:date>
      <res:value>2500.00</res:value>
    </res:balance>
    <res:balance>
      <res:date>2011-10</res:date>
      <res:value>2500.00</res:value>
    </res:balance>
  </res:accounts>

```



```

</res:accounts>
<res:financialInstitution>
  <res:locationId>7750022</res:locationId>
  <res:institutionId>6662455</res:institutionId>
  <res:institutionName>Fourth Example Institution</res:institutionName>
  <res:headOfficeAddress>
    <res:addressLine1>200 W. Greenland Pkwy</res:addressLine1>
    <res:city>Nowhere </res:city>
    <res:state>NY</res:state>
    <res:zip5>11111</res:zip5>
  </res:headOfficeAddress>
</res:financialInstitution>
</res:response>
</res:assetVerificationResponse>

```

**Example Response**

If the above response example is entirely accepted by the Agency, then the following successful acknowledgment is sent to PCG:

```

<?xml version="1.0" encoding="UTF-8"?>
<res:assetVerificationResponseAck
xmlns:res="https://avs.pcgus.com/v1.0.0/assetVerification/responseAck">
  <res:agencySystemId>ExampleSysId</res:agencySystemId>
  <res:transmittalId>1540</res:transmittalId>
  <res:status>SUCCESS</res:status>
</res:assetVerificationResponseAck>

```

**Example Successful Response Acknowledgment**

If there is a problem that prevents the entire file from being accepted, then the following is an example of a failure acknowledgment sent to PCG:

```

<?xml version="1.0" encoding="UTF-8"?>
<res:assetVerificationResponseAck
xmlns:res="https://avs.pcgus.com/v1.0.0/assetVerification/responseAck">
  <res:agencySystemId>ExampleSysId</res:agencySystemId>
  <res:transmittalId>1540</res:transmittalId>
  <res:status>FAILURE</res:status>
  <res:reason>
    <res:reasonCode>0001</res:reasonCode>
    <res:reasonDescription>Invalid XML</res:reasonDescription>
  </res:reason>
</res:assetVerificationResponseAck>

```

**Example Failure Response Acknowledgment**

Lastly, if there is a problem with some responses, but not others then the successful responses are accepted and the failed ones are rejected. A particular response must be either entirely accepted or entirely rejected—so that Accuity can correct the problem and resend the failed response in a later transmission.

```

<?xml version="1.0" encoding="UTF-8"?>
<res:assetVerificationResponseAck
xmlns:res="https://avs.pcgus.com/v1.0.0/assetVerification/responseAck">
  <res:agencySystemId>ExampleSysId</res:agencySystemId>

```

```

<res:transmittalId>1540</res:transmittalId>
<res:status>PARTIAL</res:status>
<res:reason>
  <res:clientRequestId>2</res:clientRequestId>
  <res:requestId>6000</res:requestId>
  <res:reasonCode>0002</res:reasonCode>
  <res:reasonDescription>Description of reason 0002</res:reasonDescription>
</res:reason>
<res:reason>
  <res:clientRequestId>3</res:clientRequestId>
  <res:requestId>6001</res:requestId>
  <res:reasonCode>0002</res:reasonCode>
  <res:reasonDescription>Description of reason 0002</res:reasonDescription>
</res:reason>
<res:reason>
  <res:clientRequestId>4</res:clientRequestId>
  <res:requestId>6003</res:requestId>
  <res:reasonCode>0003</res:reasonCode>
  <res:reasonDescription>Description of reason 0003</res:reasonDescription>
</res:reason>
</res:assetVerificationResponseAck>
    
```

**Example Partial Success Response Acknowledgment**

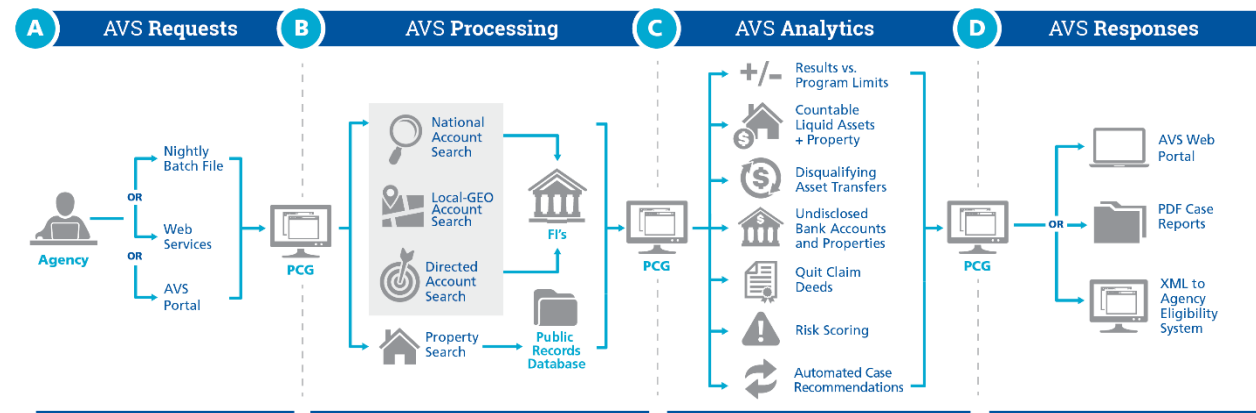
PCG can mimic the services described above via batch file exchanges at the State's request.

**2.3 AVS Services Delivery**

PCG's AVS is trusted by more Medicaid agencies than all of our competitors combined. PCG processes more than 2 million asset and eligibility verification transactions every single day and has discovered hundreds of millions of dollars of undisclosed applicant and beneficiary assets.

**2.3.1 AVS Processing**

PCG's AVS is designed to allow our agency clients to access the service by whatever method is most convenient to the agency. PCG understands that the State's preference is to access an AVS via real time web services calls between DHHR and PCG. PCG's AVS workflow is illustrated as follows:



**PCG's AVS Process:** *PCG's AVS process is flexible and customizable to allow the State to integrate our service in the least disruptive manner possible.*

## A. AVS Requests

There are three primary mechanisms by which our clients can submit requests for asset verification to the PCG Team for processing. PCG will process any requests sent to us, including for a member, applicant, spouse, parent, and/or legal guardians of applicants or members. PCG's other AVS clients submit requests either in real time or the day of application and 30-60 days prior to each member's renewal date.

- 1 Batch Transfer:** The batch transfer method allows our clients to securely transfer files containing AVS requests to a SFTP server on a nightly basis. PCG works with our clients to create business rules to allow you to select and batch all new applicable applications and renewals received each day for transmission. Request data can either be pulled by PCG from DHHR' SFTP server, or DHHR can deliver it to a SFTP server hosted by PCG.
- 2 Web Services:** Another primary mechanism for submitting AVS requests is via real-time web services calls. PCG hosts the AVS request service and will provide DHHR with an industry standard WSDL to allow you to create interfaces within your eligibility system to submit real-time requests and receive request acknowledgments and error messaging.
- 3 AVS Web Portal:** The PCG AVS Web Portal is an independent web application which allows our clients to connect with our AVS service while minimizing, or avoiding altogether, the need for interface development activities within your eligibility system.

## B. AVS Processing

Regardless of the request transmission method chosen by DHHR, PCG uses multiple processes concurrently to identify all of the assets maintained by applicants and beneficiaries:

- 1 National Account Search:** PCG processes all AVS requests through the Early Warning national database of accounts held at the nation's largest approximately 10-15 Financial Institutions (FIs) to identify any account maintained by a consumer at any of the nation's largest FIs anywhere in the United States. These financial institutions represent approximately 50 percent of the depository accounts in the United States and allow PCG to quickly verify the existence of any applicant/beneficiary account at any of the financial institutions anywhere in the United States. 100 percent of all PCG AVS cases are processed through this national network of financial institutions in order to ensure PCG's coverage is as comprehensive as possible.
- 2 Local Account Search:** PCG, in concert with our AVS data partner, Accuity, afford the State with *independent access to 100 percent of the financial institutions in the United States*, allowing our clients to query large multinational banks, regional and online banks, and small FIs and credit unions alike to identify 100 percent of applicant and beneficiary assets potentially affecting eligibility for benefits. As Appendix 1 of this proposal, PCG has attached a list of the West Virginia regional financial institutions to be included in PCG's proposed AVS. Additional financial institutions will also participate should an applicant/beneficiary have an address outside of this region.

Because Accuity has been the ABA Registrar for the American Bankers Association for more than 100 years and due to their pioneering role establishing and operating AVS on behalf of the Social Security Administration's SSI program, Accuity maintains relationships with 100 percent of the depository financial institutions in the United States and PCG proposes to include this FI network in the State of West Virginia's AVS program.

Finally, as the registrar for the American Bankers Association since 1908 currently servicing more than 17,000 financial services clients, Accuity is a well-known and well-respected organization in the banking community and is therefore well-positioned to coordinate between DHHR and the FI community.

The PCG Team's network of financial institutions includes banks, savings and loan companies, credit unions, and any other depository FI and returns the following account types: Annuities; Time/CDs; Checking Accounts; Savings Accounts; Custodial Accounts; Burial or Funeral Accounts; IRAs; Money Market Accounts; Social Security Accounts; Keoughs; Rent Securities; Trusts; and Christmas Club Accounts.

In the performance of our targeted local search for applicant/beneficiary assets, the PCG Team utilizes a geographic search application to identify local and regional FIs most likely to maintain an applicant and/or beneficiary account based on logic such as geographic proximity to the customer's address. The PCG Team utilizes Accuity's Geographic Undisclosed Account Radial Detection component, or GUARD, as the mechanism that determines logic by which asset verification requests are to be distributed to FIs. GUARD utilizes various FI databases and proprietary logic to optimize the probability of identifying Financial Institutions specific to a search for financial assets owned by an individual benefits applicant/beneficiary.

The GUARD application provides a means to identify the FI most likely holding assets for Medicaid claimants and beneficiaries. In part, by focusing on FIs with offices closest to the customer, the GUARD application provides a reasonable approximation of the likelihood that a customer would have undisclosed accounts with a particular FI.

The operational efficiency of GUARD searches involves several factors. The following data elements are the criteria which most affect GUARD's selection of FIs:

Element	Description	GUARD Selection
Distance	Physical distance from the customer's address to the FI's location.	Smaller values are ranked higher
Presence	The number of branches the FI has in the same zip code as the customer. Calculated from Accuity's information for each zip code.	Smaller values are ranked lower
Branches	The FI's number of Branches across the US. Indicator of the national size of the FI.	Smaller values are ranked lower
Direct Deposits	The FI's number of SSI Direct Deposit Accounts as an indicator of national ABD population of accounts.	Smaller values are ranked lower

The GUARD algorithm has been developed and refined in concert with the Social Security Administration since 2003 in support of their Supplemental Security Income (SSI) AVS program.

The PCG Team's Financial Institution Network is trained to provide account balance information for both open and closed accounts for up to 5 years. They are also trained to pay attention to the timelines requested by our clients as the request may include only certain periods during the 5 year look-back period depending on the request type.

- 3 Directed Account Search:** In addition to our national and local account searches, PCG's AVS will allow your authorized users to request account look-ups at any specific banks in the entirety of the United States, either via web services calls, batch file transmissions, and/or within the AVS Web Portal.
- 4 Property Search:** The PCG Team will leverage LexisNexis's data repository of public records and commercially available data to identify Real Property. The LexisNexis repository is the largest and fastest-growing such repository in the country, and links together in excess of 44 billion records drawn from over 10,000 disparate sources, accounting for 700 million unique identities.

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Data sources are refreshed daily, meaning that the information that will be provided is no older than this morning. In addition to the current data store, an average of 30 million raw files are processed daily, continually adding to the breadth of information available to DHHR.

Using the LexisNexis core strengths of unrivaled data sets, identity linking, and highly scalable technology, the LexisNexis Benefit Assessment Solution allows DHHR to confidently access the most comprehensive and relevant property data during your Medicaid enrollment process.

The LexisNexis Benefit Assessment is driven by an extensive core database and a proprietary linking technology. DHHR will be able to apply massive amounts of data in an accurate and efficient manner and receive verified, accurate data relevant for your mission. Benefits Assessment allows for single, multiple, or mass queries providing systematic delivery of the data that is most important to you in identifying and verifying real property.

With over 3.2 billion property records, LexisNexis property data includes assessment records from 52 states and territories, some going back to the 1970s, and deed and mortgage records from 50 states, with some dating back as far as 1900.

Using the LexisNexis Benefit Assessment solution, PCG will:

- 1) Resolve to the identity
- 2) Return comprehensive, current and historical property information associated to the individual:
  - a. Property location information (current and prior)
  - b. Owner/co-owner names
  - c. Seller(s) names
  - d. Transaction dates
  - e. Value: purchased price, sales price, assessments, mortgage/loan amount, market value
  - f. Deed type (quitclaim, interfamily transfer, etc.)
  - g. Number of properties owned
  - h. Return relevant data up to and beyond 60 months

PCG uses LexisNexis' vast property data sources comprised of deed, mortgage, and assessment data from across the United States. In addition to receiving property records for the state of West Virginia, LexisNexis also updates and maintains historical property data for 51 states and territories including Washington, DC. This access provides the ability to identify property that is owned outside of West Virginia and its neighboring states, thus creating a more comprehensive picture of the applicant.

Regardless of the request transmission method chosen by our clients, multiple processes are used concurrently to identify all of the property assets maintained by applicants and beneficiaries:

1. **Deed Search:** PCG processes all AVS requests through the LexisNexis deed database containing millions of records updated on a bi-weekly basis and every time a property is purchased or sold.
2. **Mortgage Search:** PCG processes all AVS requests through the vast LexisNexis mortgage database containing millions of records updated on a bi-weekly basis and every time a property is purchased or sold.
3. **Assessment Search:** PCG processes all AVS requests through the LexisNexis assessment database containing millions of records updated on an annual basis or every time an assessment is completed.
4. **Liquid Asset Search:** PCG also processes all AVS requests through our financial AVS data partner's network of 100 percent of the financial institutions in the United States. PCG's ability to

combine property and liquid asset searches into a single solution truly distinguishes us from our competitors.

The combination deed, mortgage, and assessment searches, and LexisNexis' ability to link disparate and incomplete records to applicants' identities, ensures the most comprehensive net for detecting assets maintained by the State's applicants and beneficiaries.

The combination of our national account detection search, local geo-search, directed account search, and property search ensures the United States' most comprehensive search for detecting assets and properties maintained by the applicants and beneficiaries.

### C. AVS Analytics

If DHHR were to access PCG's AVS via our AVS Web Portal, PCG will apply our proprietary analytics to this data to automatically identify case characteristics representing potential ineligibility and/or fraud. PCG's AVS Web Portal includes configurable business rules, or analytics, which automatically calculate the following based on the business rules which are applicable to each request type and household size variation, as follows:

- 1 Results vs. Program Limits:** During the requirements definition phase of this engagement, PCG will work with DHHR to match program limits to each request type + household size variation DHHR will be sending to the AVS.
- 2 Countable Liquid Assets and Property:** PCG can exclude certain account types and/or property from being included in the calculation of applicant/beneficiary resources across all requests or based on the request type variation. For example, several of PCG's state clients exclude IRA and Burial Fund account balances from being included in the calculation of an applicant/beneficiary's current resources.
- 3 Disqualifying Asset Transfer:** PCG's AVS automatically identifies and flags potentially disqualifying asset transfers, including significant decreases in account balances prior to application. PCG can configure these flags based on State-defined "strength" thresholds.
- 4 Undisclosed Bank Accounts:** PCG's AVS can automatically identify and flag those accounts which were previously undisclosed by the applicant/beneficiary provided the State can include this information in the request sent to PCG.
- 5 Spouse Assets Impacting Resource Calculations:** PCG's AVS combines spouse cases when appropriate to ensure that all countable spouse assets are included in the calculation of resources.
- 6 Risk Scoring:** PCG's AVS includes configurable business rules which allow us to quantify the level of risk of ineligibility and/or fraud each applicant or beneficiary represents to the State based, primarily, on the value of their discovered resources vs. program limits and, secondarily, on the results of the other analytics listed above.

### D. AVS Responses

PCG's AVS responses will include all financial information provided by financial institutions and property data discovered anywhere in the United States.

There are three primary mechanisms by which DHHR can receive responses to asset verification requests:

- 1 Web Services:** One primary mechanism for receiving AVS responses is via real-time web services calls. DHHR or PCG hosts the AVS response service and DHHR will need to create

interfaces within your eligibility system to receive responses, and to create acknowledgments and error messaging.

**2 AVS Web Portal:** The PCG AVS Web Portal is an independent web application which allows our clients to access our AVS responses while minimizing, or avoiding altogether, the need for interface development activities within your eligibility system. PCG offers direct, click-through access to our Portal from your eligibility system via PCG's AVS Click-Through Gateway (CTG). Alternatively, the State can access our Portal as a stand-alone web application with only an internet connection required. Either approach will allow workers to access all of PCG's AVS data and corresponding analytics.

**3 PDF Summaries:** After receiving a request from the agency and processing it, PCG can return a PDF document detailing all discovered account and property information and PCG's corresponding analytics. PCG can return these responses via SFTP and/or include these PDF reports within our AVS Web Portal for worker download.

Because PCG is proposing to query national, regional and local financial institutions, responses are not instantaneous as many FIs process requests differently. The average FI response time is 1.7 days and PCG receives 90 percent of FI responses within five days. Responses will either indicate that no accounts were found, that the identity of the applicant could not be verified, or that accounts were found. For those responses where an account was identified – regardless of whether it is currently open or close - the response will include: account branch name; account branch address; account owner(s); account type(s); open/close dates; first minute of the month account balances for every month of the look back period; and first minute of the month interest earned for every month of the look back period. Additionally, PCG will include any data received in the original request (e.g. case number, case type, etc.) with our AVS response.

Property responses can be returned in near real-time or as a nightly batch file return.

### 2.3.2 System Security

PCG's AVS complies with NIST, FIPS, and SAS 70 requirements. PCG's AVS adheres to the same authorization and confidentiality standards as the AVS used by the Social Security Administration and is compliant with NIST standards, The Financial Modernization Act of 1999 (Gramm-Leach Bliley), Privacy Act of 1974, Computer Security Act of 1987, OMB Circular A-130, Health Insurance Portability and Accountability Act of 1996, Fair Credit Reporting Act, HITECH Act, and more.

As a hosted solution provider, PCG acknowledges and accepts that it is incumbent on every service provider to enable proper protection and control for the management and safe-keeping of our data, and particularly for the data that we are entrusted to store on behalf of our clients.

PCG will take necessary steps to:

- ✓ Assure appropriate protections and controls are developed and followed,
- ✓ Apply appropriate standards such as those outlined in NIST 800-53, ISO 27001, etc., and
- ✓ Comply with pertinent regulations (e.g. HIPAA, FERPA) governing the access to protected data.

Confidential data in PCG's custody is encrypted while it is at rest, including data stored on workstations and desktops, removable media, and backups.

It is also encrypted when in motion over untrusted networks, including data traveling via Internet, Wi-Fi, or non-PCG managed/unprotected networks. PCG also employs encryption in its email system to ensure outbound emails containing confidential information are appropriately secured. PCG's encryption standards include the following:

PCG's Encryption Standards	
Wi-Fi	<ul style="list-style-type: none"> <li>Wireless signal encryption WPA2+AES-CCMP is used</li> <li>WEP or WPA are not used in any circumstances</li> <li>WPA2+TKIP can be used in situations where compatibility issues arise</li> </ul>
Web Services	<ul style="list-style-type: none"> <li>Secure protocols are used, including HTTPS, FTP-SSL, Secure-FTP</li> <li>TLS 1.2 based encryption</li> <li>SSL 2.0, SSL3.0, Telnet or SSH v1 are not used</li> </ul>
IPsec	IPsec ESP parameters are used wherever IPsec protocol is required, IPsec AH are not used. <ul style="list-style-type: none"> <li>Encryption: AES-256 or better.</li> <li>Integrity: SHA-256 or better.</li> <li>Authentication: DH-2048 or better, or ECDH-256.</li> <li>DES or 3DES based encryptions are not used.</li> </ul>
Email	<ul style="list-style-type: none"> <li>TLS 1.2 based encryption</li> </ul>

**Data De-Identification** - All non-production data at PCG is de-identified/sanitized prior to usage in test or development systems so that it can no longer identify an individual. This helps to ensure the security of any confidential or sensitive personal information stored by PCG because it doesn't allow for unauthorized or accidental consumption of data by people with access to development/test environments who may not have that same access to production data.

**Data Loss Protection** - PCG uses Digital Guardian's data loss protection (DLP) tool and a BlueCoat proxy to protect against data loss as data moves from PCG's private network to its public network and thus moves outside of PCG's direct control. This solution contains multiple policies for data identification and it receives, monitors, and inspects all egress data to ensure secure communications and traffic. Monitoring occurs based on the following criteria:

Monitoring Criteria
Types of data, such as PHI, PII, PCI data, etc.
Keywords that indicate sensitive data
Sensitive document characteristics

The DLP solution logs all attempts, even those that are successfully blocked, to transmit confidential information out of the organization without authorization. The tool alerts PCG of any compliance violations so that the Security Operations Team can follow up to determine where issues may exist.

PCG's data loss protection tool is tied in not only to data center traffic, but also to PCG's email communications, to allow for monitoring of egress traffic, allowing the Security Operations Team to gain visibility, control, and to allow for policy enforcement where necessary.

PCG's AVS data subcontractor, Accuity, is responsible for communications directly with their network of 100 percent of the financial institutions in the United States. Accuity maintains an AVS web service which is based on the FIPS 199 security categorization. Their service ensures that the sensitive information stored in the AVS Service is maintained in a secure environment that meets all necessary requirements for a moderate risk system. Their service access control has been designed for providing the least privilege necessary for users to perform their jobs. All private and confidential data is encrypted at rest and in motion. Both the primary and secondary (Disaster Recovery) data centers are hosted in geographically diverse facilities. Both facilities are Tier III and SAE-16 Type II certified.



PCG recognizes that having a robust security program is critical in minimizing the impact of threats inherent in today's workplace and computing environments. We are committed to maintaining a healthy process of periodic audit and review of our program to assure that we are accomplishing our, and our clients', goals and objectives in protecting sensitive data and to assure that we evolve and adapt to address an ever-changing environment and threat landscape over time. PCG agrees to incorporate all requirements mandated through federal and State regulations and legislation, including new reporting requirements.

**Accreditation**

PCG's data centers and IT hosting operations are subjected to annual external validation and auditing by a certified auditing firm in good standing. PCG maintains SSAE 16 SOC 2 accreditation for our facilities and IT hosting.

**Security Framework – Access Control**

**Role-Based Security Access** - PCG systems use a role-based access control system to grant access to data and systems for authorized users. All users are assigned a role (i.e., user type) as part of the account provisioning process. Access to data within the systems is restricted to just those areas to which a user's role has been authorized.

In addition to access and permission controls, the role-based system also defines which roles have the capability to add and/or modify the defined roles (i.e., access administration). The system also incorporates the principle of least privilege to ensure that each role is granted the minimum acceptable access for the associated job function. Roles are based on the typical tiers of administrator rights, change/modify rights, and read only rights, although they may vary by system depending on the type of data or intended use of the system.

The role-based access system also ensures separation of duties and requires that administrators use separate privileged and non-privileged accounts for administrative and non-administrative activities, respectively. Administrative account activity is logged and reviewed for anomalies and accounts are created, where technically feasible, with traceability to an individual.

**Account Management** - Provisioning of access to PCG assets is tracked throughout the lifecycle of an account, from creation to deletion. A number of controls are employed to ensure effective management of accounts, including, but not limited to:

Controls for Account Management
Dual approval requirement for account creation or changes
Role-based access, as described in the preceding section
Revocation of access upon violation of security policy or termination of employment
Removal of access upon completion of tasks or job function for which the access was granted
Coordination of intra-company transfers to update access privileges based on job function (as necessary)
Regular auditing of accounts, including investigation of inactive accounts and re-approval of active accounts, as described in the following section
Documentation of all account changes, including creation and deletion
Forced session time-outs (automatic logoff), where technically feasible, following a period of inactivity
Logging and investigation of attempts by an account to access data to which the account is not authorized

Access to all PCG assets is requested and approved through an access change control process. All new, changed, or deleted systems access is tracked through service requests in PCG’s RemedyForce incident and change management system. This process ensures that two approvals (user’s manager and system owner) are in place prior to access being granted to a user. It also creates an audit trail to increase accountability and allow for reviews of access decisions and approvals as required.

Additional controls are in place to further restrict temporary or contract employees’ access to PCG assets, including the requirement of an account expiration date not to exceed either the duration of their contract or one year, whichever is shorter.

**Audit of Access** - PCG regularly audits access to its assets to ensure appropriate access levels are maintained. This process requires a dual review and re-approval of all accounts by the manager of the user and the owner of each asset. Any accounts for which access is rejected by the manager or owner are removed and that removal is documented through the access control process. Accounts that are found to have not been logged into for at least thirty days are also disabled through the access control process.

Accounts are also reviewed to ensure association with an active, individual member of PCG’s workforce. Shared accounts are prohibited at PCG.

**Security Framework – Audit and Accountability**

**Compliance** - PCG promotes accountability, identifies and addresses gaps in compliance, and conducts regular compliance assessments. These assessments include both self-assessment procedures and assessment by third-parties to ensure compliance with established policies and standards. PCG recognizes that operational consistency is a cornerstone to a successful security program and strives to identify and remediate compliance gaps before they become security events that put PCG and its clients at risk.

Compliance gaps are identified through a number of mechanisms designed to examine the effectiveness of our security solutions, including regular collection of compliance metrics and review of audit logs and operational documentation. Compliance metrics comprise PCG’s entire security program and intend to measure operational effectiveness of the designed security controls and identify areas where process or solution improvements are required. These metrics are designed to measure situations including, but not limited to, the following:

Compliance Metrics-Related Situation	Target Percentage
Percentage of user accounts with access removed more than 48 hours after last day of employment	0%
Percentage of user accounts with password not set to expire after 45 days	0%
Percentage of computers with anti-virus agent installed, and computers with up-to-date anti-virus	100%
Percentage of computers with latest patches installed	100%
Percentage of alert tickets that are acknowledged and handled	100%
Percentage of staff with training completed within the past year	100%
Percentage of network devices/applications set to send logs to logging tool for analysis	100%
Percentage of changes to physical/logical access with an associated access request ticket	100%

PCG is involved in ongoing audits throughout the year, inclusive of both specific practice areas and the firm as a whole. These audits include SSAE18 SOC1 Type II, SOC2, HIPAA Gap Assessment and others and vary in scope based on client requirements and/or firm compliance initiatives.

**Documentation** - Significant investment has been made to create consistent documentation for both security governance and operations. PCG has developed a comprehensive set of information security policies and standards that align with appropriate regulations, standards, and other guidance, such as with NIST SP 800-53 rev. 4 and ISO 27001. These policies are critical to maintaining the appropriate level of emphasis on the security of our company and our clients. Operational documentation, including procedures and best practice documents, has also been created to ensure that operations are consistent and effective at maintaining the security controls that PCG has implemented.

**Audit and Logging** - PCG utilizes multiple tools for log aggregation, including centralized log gathering and correlation with monitoring and alerting tools. These systems are monitored by a combination of internal resources and Alert Logic ActiveWatch, a third-party managed security service provider that delivers actionable intelligence for event remediation.

Whenever technically feasible, PCG’s infrastructure systems feed log data into Alert Logic’s Log Manager correlation engine that aggregates data and applies the logs to correlate events across multiple data feeds. This correlation applies not only to all of PCG’s data feeds, but across data feeds that are fed to the engine from all clients making use of the Alert Logic tool. All logs and the correlation data are monitored 24/7 by the Security Operations Center, which is responsible for notifying the PCG Security Operations Team within 15 minutes of identifying any security events requiring additional investigation.

All of PCG’s critical infrastructure generates logs whenever any of the following activities are requested to be performed by the system:

System Events that Result in Generated Logs
Create, read, update, or delete confidential information
Authentication Events
Privileged Access Activity
Detection of suspicious/malicious activity such as from an Intrusion Detection/Intrusion Prevention System (IDS/IPS), anti-virus system, or anti-spyware system
Grant, modify, or revoke access rights, including: <ul style="list-style-type: none"> <li>▪ Adding a new user or group</li> <li>▪ Changing user privilege levels</li> <li>▪ Changing file permissions</li> <li>▪ Changing database object permissions</li> <li>▪ Changing firewall rules</li> <li>▪ User password changes</li> </ul>
System, network, or services configuration changes including installation of software patches and updates or other installed software changes

Log data is stored offsite to ensure it can be accessed in the case of an emergency/disaster scenario. It is preserved according to our data retention policy and can be used to investigate and audit specific events whenever necessary.

**Security Framework - Awareness and Training**

PCG has deployed a training suite that was designed by Inspired eLearning, an external market-leading provider of security training recognized for adherence to security standards. The trainings are customized to include additional PCG-specific security training content and are updated annually by Inspired

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eLearning to reflect required changes to regulations or the security climate. Everyone in the PCG workforce is required to complete three trainings on an annual basis: Basic Security Training, Advanced Security Training, and HIPAA Training for Covered Entities. Although PCG is not always a "Covered Entity" as defined by HIPAA, we default to the higher training requirement to ensure the ability of our workforce to effectively recognize and address security situations that may arise.

The security training suite was developed to illustrate the following types of content in order to accommodate various learning styles:

- Practical exercises in security and privacy awareness training that simulate actual cyber-attacks.
- Recognizing and reporting potential indicators of an insider threat.
- Practical exercises in security and privacy training that reinforce training objectives.
- Recognizing suspicious communications and anomalous behavior on PCG's information systems.

In addition to the required training suite, PCG's Information Security team has implemented a comprehensive awareness program that spans all areas of security. The team regularly interacts with the PCG workforce to ensure security awareness through a number of avenues, including simulations of security events, informational newsletters and marketing materials, and in-person site visits to a myriad of PCG office locations.

#### ***Security Framework - Configuration Management***

***Change Management*** - All changes made to PCG's production environments are required to go through a systematic change control process that aims to minimize unnecessary business disruption being caused by changes to the environment. PCG uses RemedyForce as its system of record for change control. The change control process requires that every change be documented thoroughly in a change request ticket in RemedyForce that must receive appropriate approval(s) prior to implementation of the change. Appropriate approvals are determined by the type of change and the risk that is associated with deployment of that change, and are usually representative of both technical and business management perspectives.

In addition to receiving individual technical and business approvals, all changes must also be presented to the Change Approval Board (CAB) that meets on a weekly basis. The CAB consists of representatives from each of the business units, including the Information Security team, which is responsible for a security review of each change. Any member of the CAB has the authority to reject a change that is deemed to be unfit for production.

All change request tickets in RemedyForce are required to contain specific information before they can be presented to the CAB for approval. This information includes, but is not limited to:

- A functional design
- An implementation plan
- A change window (time period) during which the implementation is planned
- A test plan to ensure success of implementation
- A back-out plan in case issues are encountered during implementation
- A description of the impact of the change
- Revisions to any documentation impacted by the change

If any of this information is not included, the ticket will be rejected and pushed out for review at a future CAB meeting, following the inclusion of the appropriate information in the change request.

**Asset and Configuration Management** - A configuration management database (CMDB) is deployed at PCG and contains a full inventory of all critical technical assets, including, but not limited to, network devices, workstations, and servers. Effective configuration management establishes a discipline for maintaining relevant information throughout an information system or system component's lifecycle. PCG's CMDB is used as an authoritative source for PCG's technical inventory and is synched regularly to ensure its accuracy and consistency with other tools used to maintain our systems.

The CMDB includes the following information to enable tracking, reporting, and maintaining of accountability:

CMDB's Inventory
Asset tag or unique identifier
Date of purchase/assignment/transfer
Device status (e.g. Active, Decommissioned)
Asset type and sub-type (e.g. network device, managed switch)
Manufacturer
Model
Serial number
Physical location
Application supported
Asset owner
Disposal/Sanitization Certificate (for devices once they are decommissioned)

PCG's CMDB is deployed using the RemedyForce tool, which is also used for incident and change management. The correlation of these processes in the RemedyForce tool creates operational efficiencies and often may allow for a shorter downtime because of the information that can be provided on demand. Additionally, we use the CMDB as a baseline for our inventory, which is critical in capturing compliance metrics that help us to catch and remediate operational issues before they become incidents or breaches.

**Systems Hardening** - Workstations, servers, and network devices at PCG are hardened in a manner tailored for each specific class of device. Secure configurations have been developed for all approved workstation and server operating systems and software applications and these configurations are deployed to all devices on the PCG network. The secure configurations are maintained as standardized system images ("gold images") that are validated and refreshed quarterly to update their serviceability, availability, and secure configuration. These images are also vulnerability tested using a scanning tool to verify that all secure configuration elements have been remediated.

Servers are hardened by group policy that includes, but is not limited to, enforcement of:

- ✓ Usage of only Internet Explorer web browser on servers
- ✓ Limiting of scripting languages in all web browsers

Workstations are hardened by group policy that includes, but is not limited to, enforcement of:

- ✓ Password complexity
- ✓ Inactivity timeout timer
- ✓ Renaming and disabling of Local Administrator and Guest accounts
- ✓ Digitally signed communication between workstations and Active Directory (AD)
- ✓ Auto-play disabled for removable media
- ✓ Login security banner

- ✓ Host-based firewall enabled
- ✓ Limited usage of scripting languages in all web browsers

Network devices are configured by following a standard deployment checklist that requires a specific list of settings to be configured, such as preventing remote administration of network devices unless connected via multi-factor VPN, using Network Address Translation so that no publicly routable addresses are on trusted interfaces, and logging remote management sessions and forcing termination by session time limit. PCG firewalls have additional hardening requirements that go above and beyond the requirements for other network devices, such as being configured to block any remote access methods that are not encrypted at network ingress points. All requirements are updated at least two times per year, or when a new release is provided.

**Security Framework – Identification and Authentication**

**Authentication, Authorization, and Accounting** - A key tenet of Information Security is the use of Authentication, Authorization, and Accounting (AAA) to control access to resources. PCG has implemented tools that allow for the use of AAA for access control so that network devices and other PCG assets are accessed securely, accounts are used as intended, and all activity is logged as it is performed. These tools require multi-factor authentication for VPN connection.

**Multi-Factor Authentication** - At a minimum, PCG ensures use of single-factor authentication for accessing systems classified as containing information that is not for public consumption. No anonymous access to these resources is permitted.

For remote access, PCG’s information systems use multi-factor authentication to uniquely identify and authenticate users. Multi-factor authentication at PCG is employed using at least one factor is provided by a device separate from the system gaining access. PCG’s multi-factor authentication solution is token-based, meaning that a user must have a username and strong password in order to start the authentication process, and they must also have access to a soft token (on their phone or computer) that provides a new unique number regularly to ensure that the account is being used only by the person with that token.

**Password Management** - User security for PCG systems and applications is based on the use of usernames and passwords. A unique 'SessionID' is established and used with each subsequent request. Further, a VerifyCode is used to prevent the URL from being passed between users. Additional security precautions include:

Additional Security Precautions
Industry standard and flexibly configured password strength requirements: <ul style="list-style-type: none"> <li>▪ Passwords must not contain the user's account name.</li> <li>▪ Passwords must contain a minimum of eight characters.</li> <li>▪ Passwords must contain characters from three of the following categories:                             <ul style="list-style-type: none"> <li>▪ Uppercase letters of European languages</li> <li>▪ Lowercase letters of European languages</li> <li>▪ Base 10 digits (0 through 9)</li> <li>▪ Special characters (e.g. !, @, \$, #, %, &amp;)</li> <li>▪ Any Unicode character defined as an alphabetic character but is not uppercase or lowercase</li> </ul> </li> </ul>
Prevention of reusing four most recent passwords
Requirement to change password at least every 45 days
Lock-out after five unsuccessful authentication attempts
Login and group disable capability

Additional Security Precautions
User session time-out
Encrypted storage of user credentials
Encryption of passwords using a one-way hashing algorithm which prevents queries or reports from including usable account information

User accounts are provisioned with specific access; these methods are used to restrict a particular user to see only the data to which they have been granted access. Additional application-specific security precautions may include:

- ✓ Lexicon to protect against the use of “at risk” password values
- ✓ Multi-tier user identification
- ✓ Session-based IP Address revalidation. This check can be disabled if you are behind a firewall that periodically changes the apparent IP Address for a user.
- ✓ Multi-login controls—particularly against logging in simultaneously from multiple locations. The application may also be configured to authenticate the user with a remote authentication authority using several different methods, including LDAP / Active Directory, RADIUS, OpenID, and/or other customer-specific systems. When authenticated remotely, the user account in the application will not contain a password.

### **Security Framework – Media Protection**

**Data Destruction** - PCG has developed an enterprise-wide data destruction program that allows for consistent, secure disposal of data throughout all of our company. This program includes both destruction of hard and soft copies of data. Every PCG office has at least one, if not more, secure shredding bin that is processed by a SOC2-certified vendor to ensure secure disposal of any confidential data that has been printed from PCG systems or for PCG. Soft copies (data on electronic devices) are handled in two different ways, depending on whether the device is to be re-used or not. If the device is to be re-used within PCG, it is fully sanitized and wiped (using DoD 5220.22-M standards) to ensure no data is remaining when it moves on to its secondary use. If a device is to be destroyed, it is sent for secure disposal and destruction with a SOC2-certified company that provides a certification of destruction for each and every device.

**Mobile Devices** - PCG allows end users to access its data on mobile devices only when a user has a legitimate business need to do so, and even then, only with appropriate authorization. Anyone accessing PCG’s data from a mobile device must do so through a secure, encrypted, Microsoft InTune ‘container’ used exclusively for accessing PCG data. The container is configured so that data within the container cannot be moved from the container directly onto the device, and vice versa. In the case that the mobile device is compromised, for example through loss or theft, PCG has the ability to wipe all PCG data from that device remotely so that it does not fall into the wrong hands. This procedure is also executed in the event that an employee with mobile access separates from PCG.

**Removable Media** - All PCG workstations with USB drives are configured to determine if encryption exists on USB removable media upon insertion to the workstation. If encryption does not exist on the USB device, the workstation prompts to encrypt the device with BitLocker prior to upload of new data. If the device is not encrypted, data will not be transferrable to that device.

### **Security Framework – Personnel Security**

**Background Checks** - Employment at PCG is contingent upon a pre-employment background check performed during the hiring process with consent of the candidate. Employees’ background checks are conducted through HireRight, an industry-leading provider of background checks and records verification, and contain the following checks at a minimum:

- ✓ Federal Criminal Record
- ✓ County Criminal Felony and Misdemeanor Record

- ✓ National Criminal Search
- ✓ Social Security Validation
- ✓ Social Security Trace

Candidates for financial positions go through a background check that requires additional measures, such as a credit check. Additionally, all management-level positions require an additional education check. These checks allow for increased personnel security for anyone working on behalf of PCG.

**Continued Improvement** - Managers at PCG work in cooperation with their supervisee to establish annual goals and training plans that will allow for continued success at all positions. All employees additionally engage in a formal annual review process that allow for management of continued improvement of skills that are required to be successful in the position in the position which an individual is employed.

**Discipline for Violation of Security Program** - Sanctions can be applied for PCG users' non-compliance up to and including removal of access privileges and/or termination of employment/contract with PCG, depending on all the circumstances including but not limited to whether the non-compliance was intentional, persistent or repetitious, whether the breach can be remediated and the financial gravity of the consequences of the non-compliance.

**Terminated Employees** - When a staff member is terminated by Public Consulting Group or his/her working relationship with Public Consulting Group otherwise concludes (i.e., resignation, contract conclusion), all physical and information access rights and capabilities are revoked. All user keys, tokens, passes etc. are immediately be turned in by the User and deactivated by the Information Technology Department or local office manager.

**Security Framework – Physical and Environmental Protection**

**Data Center Hosting** - PCG data and equipment is hosted at two data centers, one located in Austin, TX and one located in Medford, MA. The hosting centers are designed to withstand disastrous conditions pertinent to their locations to ensure our systems and equipment won't go down under extreme conditions and to allow for continued 24/7 operation of PCG's critical systems.

Both data centers are SSAE 16/SOC certified, and feature many layered solutions to keep the environment secure, including, but not limited to, the following:

Solution	Features
Physical Features	<ul style="list-style-type: none"> <li>• Equipped with racks and cages to host equipment in secure in a secure environment</li> <li>• Built on a raised floor to accommodate cabling and special wiring</li> <li>• Temperature- and humidity- controlled environment</li> <li>• Fault-tolerant design of cooling towers, water pumps and chillers</li> <li>• Multiple air handling units to provide another level of redundancy</li> <li>• Cooling units maintain uniform 72°F and 50% relative humidity levels</li> </ul>
Disaster Readiness Features	<ul style="list-style-type: none"> <li>• Fire detection and suppression systems</li> <li>• Dual fire detection (photo-electronic ionization and sniffer) systems</li> <li>• Central fire alarm system notification with a direct alarm to the local fire department</li> </ul>
Connectivity Features	<ul style="list-style-type: none"> <li>• Equipped to provide our system's Internet Protocol (IP) connectivity to our ISP's fiber network</li> <li>• Built-in redundancy through router and switch configuration of the LAN design</li> <li>• Dual ports from unique switches</li> </ul>



Solution	Features
	<ul style="list-style-type: none"> <li>Scalability through 10 Mbps to 1000 Mbps bandwidth ports</li> </ul>
<p><b>Power System Features</b></p>	<ul style="list-style-type: none"> <li>Dual power availability to each rack unit from independent power distribution units (PDUs), eliminating PDU loss as a single point of failure</li> <li>Redundant N+1 design of uninterruptible power supplies</li> <li>Redundant stand-by generator power supplies, to be used in the event of a commercial power feed failure</li> </ul>

**Data Center Access** - Physical access to PCG’s data centers is protected from unauthorized access by use of key cards or a 2-factor- authenticated man-trap (e.g., card-key, biometric scan), depending on location. Access authorization forms must be completed and authorized by management in order for any new employee to obtain an access badge to the data center facilities. Guest access is controlled via a formal request to the facility by authorized personnel and all guests must be escorted by PCG or facility staff at all times. Access to both data center facilities is revoked within 2 hours upon termination of an employee. The complete list of those with access to either/both data centers is reviewed on at least a quarterly basis to ensure all access is still valid and authorized.

**Local Site Office Physical Access** - PCG uses a centralized badging system to ensure proper employee identification and access control throughout its facilities. Physical access at all facilities is granted through a role-based access model that designates appropriate access based on a matrix including facility zone (e.g. public, sensitive, operational), role (e.g., customer service, IT) and badge type (e.g. employee, contractor). Access is granted based on the least-privilege model and is reviewed on a quarterly basis for every office to ensure only those with continued business need have access to specific locations.

The centralized badging system additionally maintains audit logs for all PCG site access to allow for review both for inconsistencies and upon occurrence of suspected unauthorized access.

**Physical Security** - A number of physical security controls, in addition to physical access, are implemented at PCG. All PCG-owned or operated facilities use documented facility classification levels and zones to implement and maintain applicable physical security controls, processes, and procedures. In every office, physical zone designations are visible to indicate changes between zone types, for example between operational and sensitive areas.

PCG has a thorough clean desk policy that requires staff to maintain a clean desk whenever they are not physically present. This includes putting any sensitive materials into lockable storage, keeping work areas free of confidential information, and using privacy screen filters. It additionally requires that all PCG staff maintain physical control of laptops/notebooks whenever they are transported outside of the secured office environment.

Additional physical security controls include, but are not limited to:

Physical Security Controls
Configuration of doors to close automatically
Marked “Exit Only” doors to prohibit re-entry
Configuration of desks and workstations to face away from windows at ground-level floors
Prohibiting usage of cameras and recording devices in Sensitive Areas

Requirement for any visitors that enter a PCG facility to fill out a Visitor's Log that records their name, host's name, date/time of arrival, and visitor badge number. Upon leaving the facility, the visitor must fill out date/time of departure

Dissemination of emergency action plans, including evacuation routes to use in the event of an emergency or power outage

**Local Site Office Environmental Control** - PCG provides protection against physical and environmental events that may cause disruption, damage, or destruction to PCG owned or operated facilities and sensitive information. Every PCG-owned or operated facility features automatic emergency lighting, known and easily accessible master shutoff or isolation valves for water systems, and automatic fire detection or suppression systems supported by an independent energy source.

PCG equipment/server rooms are dedicated spaces that cannot be used for other purposes. Every equipment room has protections in place, such as short term backup power, dedicated HVAC systems, and 24/7 monitoring of all equipment rooms for power failure, HVAC alarms, and over-temperature conditions.

#### **Security Framework – Planning**

**Maintenance, Supervision and Review** - PCG's security methodology follows the Plan-Do-Check-Act (PDCA) method, as identified in the ISO 27001 and NIST SP 800-53 rev. 4 for establishing an Information Systems Management Framework. This model embodies PCG's core principle and approach: Security is not a destination or 'checkbox' activity, but rather an integral part of doing business. As threats evolve and more sophisticated attacks are detected, our security posture and controls must adapt to align, so that we continue to earn – and deserve – our clients' trust. The PDCA methodology, in its simplest terms, is represented in the following steps:

- ✓ **Plan:** Establish the security baseline and requirements and build the System Security Plan (SSP). This step is a collaborative effort between PCG and our clients to identify the appropriate security categorization and right-sized controls.
- ✓ **Do:** Implement and operate controls as described in the SSP. Controls are monitored, and defined processes are used, to manage the day-to-day security activities once the solution is live.
- ✓ **Check:** Assess control effectiveness and provide full transparency for client assessment and 3rd party regulatory compliance assessments. This includes independent SSAE 16 Type II assessments from certified auditing firms.
- ✓ **Act:** Control improvements as either a result of assessments or as new threats are analyzed and reviewed. Where applicable, control improvements are then fed back into the SSP continuous improvement cycle.



**Information Security Program Monitoring** - Procedures are in place to regularly monitor the Information Security Program to ensure that it is operating in a manner reasonably calculated to prevent unauthorized access to or unauthorized use of confidential data and for escalating it as necessary. The monitoring shall include internal reviews by the Information Security Officer, annual SSAE 16 SOC I and SOC II audits and annual penetration/vulnerability testing.

**Security Framework – Program Management**

**Enterprise/Network Architecture** - PCG has made significant investment in security solutions across all of the organization. Although PCG has segmented practice areas that in many ways operate independently, the Information Security program was deliberately created so that program governance could be centralized. All of PCG's practice areas have some level of interaction with very sensitive data, such as PHI or student records, and thus the expectation at PCG is that all practice areas be held to the same security requirements across the board.

In addition to the enterprise architecture, PCG performs a regular review of its network architecture to ensure deployment of systems/devices to accommodate high availability and network segmentation.

**Network Segmentation** - PCG's network is partitioned into multiple subnetworks and associated virtual local area networks (VLANs), which default to having no physical or logical access to each other (trust no one model). This approach allows for segmentation between practice areas and their customers wherever it is possible to do so. Practice area data is both physically and logically separated to provide security and bandwidth and to avoid performance impacts caused by other tiers.

**Security Framework – Risk Assessment**

**Internal Risk Assessment** - PCG annually conducts an internal, tiered risk assessment that follows the NIST 800-53 methodology. The risk assessment evaluates risks in three tiers: Organizational (corporate and leadership), Mission/Business Processes (practice areas), and Information Technology (Corporate Technology department). Any risks that are identified are logged in a Risk Register and presented to our Audit Committee, responsible for determining the priority with which risks should be handled. Accepted risks are logged and re-visited regularly to ensure that it still makes business sense to continue to accept each risk. Any risks that are not accepted are assigned an owner, who is responsible for coming up with a

plan and timeline for remediation of the risk. Exceptions to our policies are automatically considered risks and PCG requires that they be logged, regularly reviewed, and tracked.

**Regulations and Security Requirements** - All PCG applications in scope of this RFP undergo regular audits and security vulnerability testing to ensure up-to-date compliance with industry security standards. In creating our Information Security Program, we considered a variety of regulations, such as HIPAA and FERPA, and industry standards, such as NIST 800-53 rev. 4, to ensure the security of all data at PCG. PCG undergoes a series of annual audits and assessments by an external security audit firm to ensure PCG’s ability to meet regulatory security requirements.

**Data Classification** - A thorough Data Classification Policy and Standard has been developed to ensure the appropriateness of controls in place as data travels within and outside of our network. Due to the nature of our business, most of the data that PCG handles is confidential or sensitive in nature. The Data Classification Policy clearly states that uncategorized data needs to assume the highest level of classification (confidential) and handled as appropriate for that level.

**Vulnerability Management** - PCG’s vulnerability management solution, Rapid 7, allows for on-demand scanning of the PCG network to:

PCG’s Rapid 7 Vulnerability Scans	
Identify top vulnerabilities, most vulnerable system types, and most vulnerable hosts, for example:	<ul style="list-style-type: none"> <li>• Missing operating system (OS) security patches</li> <li>• Missing application security patches</li> <li>• Insecure cyphers allowed, indicating a deviance from PCG standards</li> </ul>
Find open ports and services running in the target scope and match them to well-known published vulnerabilities updated regularly in the tool’s signature database if they exit in the target infrastructure.	
Identify systemic issues and root cause	

Vulnerability scans are performed at least quarterly, and as needed based on specific alerts regarding security threats, discovery of an exploit, or changes/additions to infrastructure. All scan detail is triaged to validate found vulnerabilities and to remediate as required.

In addition to the regular internal vulnerability scans that are performed, PCG also works with a vendor to perform a full external penetration test on an annual basis. Following the scan, PCG’s Information Security team receives a report of vulnerabilities and then works to remediate where required before the vendor performs a second test to ensure vulnerabilities have been remediated.

**Security Framework – System and Communications Protection**

**Encryption** - Confidential data in PCG’s custody is encrypted while it is at rest, including data stored on workstations and desktops, removable media, and backups.

It is also encrypted when in motion over untrusted networks, including data traveling via Internet, Wi-Fi, or non-PCG managed/unprotected networks. PCG also employs encryption in its email system to ensure outbound emails containing confidential information are appropriately secured. PCG’s encryption standards include the following:

PCG’s Encryption Standards	
Wi-Fi	<ul style="list-style-type: none"> <li>• Wireless signal encryption WPA2+AES-CCMP is used</li> <li>• WEP or WPA are not used in any circumstances</li> <li>• WPA2+TKIP can be used in situations where compatibility issues arise</li> </ul>
Web Services	<ul style="list-style-type: none"> <li>• Secure protocols are used, including HTTPS, FTP-SSL, Secure-</li> </ul>

	<ul style="list-style-type: none"> <li>FTP</li> <li>TLS 1.2 based encryption</li> <li>SSL 2.0, SSL3.0, Telnet or SSH v1 are not used</li> </ul>
IPsec	<p>IPsec ESP parameters are used wherever IPsec protocol is required, IPsec AH are not used.</p> <ul style="list-style-type: none"> <li>Encryption: AES-256 or better.</li> <li>Integrity: SHA-256 or better.</li> <li>Authentication: DH-2048 or better, or ECDH-256.</li> <li>DES or 3DES based encryptions are not used.</li> </ul>
Email	<ul style="list-style-type: none"> <li>TLS 1.2 based encryption</li> </ul>

**Data De-Identification** - All non-production data at PCG is de-identified/sanitized prior to usage in test or development systems so that it can no longer identify an individual. This helps to ensure the security of any confidential or sensitive personal information stored by PCG because it doesn't allow for unauthorized or accidental consumption of data by people with access to development/test environments who may not have that same access to production data.

**Security Framework – System and Information Integrity**

**Data Loss Protection** - PCG uses Digital Guardian's data loss protection (DLP) tool and a BlueCoat proxy to protect against data loss as data moves from PCG's private network to its public network and thus moves outside of PCG's direct control. This solution contains multiple policies for data identification and it receives, monitors, and inspects all egress data to ensure secure communications and traffic. Monitoring occurs based on the following criteria:

Monitoring Criteria
Types of data, such as PHI, PII, PCI data, etc.
Keywords that indicate sensitive data
Sensitive document characteristics

The DLP solution logs all attempts, even those that are successfully blocked, to transmit confidential information out of the organization without authorization. The tool alerts PCG of any compliance violations so that the Security Operations Team can follow up to determine where issues may exist.

PCG's data loss protection tool is tied in not only to data center traffic, but also to PCG's email communications, to allow for monitoring of egress traffic, allowing the Security Operations Team to gain visibility, control, and to allow for policy enforcement where necessary.

**Intrusion Detection** - PCG utilizes Alert Logic's Threat Manager and FireEye's industry-leading intrusion detection systems (IDS), which provide near real-time visibility and analysis of the traffic on PCG's network. A content inspection area is used to analyze all traffic going to and from critical systems on the network. FireEye has the capability to detect multi-flow, multi-stage, zero-day, polymorphic, ransomware and other advanced attacks. These tools are also set to prevent callbacks for malware that may exist within the PCG network, causing the malware to be rendered useless as it cannot reach back to its host. All events that are detected by these tools are tied into the logging software also used by PCG, so that PCG's Security Operations Team is alerted when an event is detected that requires further investigation. The 24/7 Security Operations Center is also able to use the data from the IDS to analyze known threats in real-time when patterns of malicious activity or other anomalous traffic are observed.

**Malicious Code Protection** - All PCG facilities involved in information computing systems, operating either internally or remotely of that facility, maintain an instance of a PCG-approved anti-virus software application. All PCG information computing systems, including workstations, laptops, and servers, are

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required by policy to utilize an approved anti-virus software application to protect the host system and its information from any damage that may result from the receipt of malicious code.

PCG requires that all anti-virus software installed on computing systems will be active and enabled at all times. Personnel are not permitted to suspend or disable the state of the software from monitoring and checking a system for malicious code. Policies enforced on end user computer systems to ensure virus scan coverage on PCG computer systems. Virus signatures are updated daily. Server systems will not be managed using this system due to their individual requirements. Virus protection is implemented on server systems where required.

All instances of installed anti-virus software are configured to constantly scan and defend, in real-time, its host computing system from the ingress of malicious code. This is to protect the host and prevent the proliferation of malicious code to other systems. In parallel with this, such anti-virus software is also configured to perform routine scans of the entire host's file system.

### 2.3.3 Financial Institution Network

PCG, in concert with our AVS data partner, Accuity, afford the State with *independent* access to 100 percent of the financial institutions in the United States, allowing our clients to query large multinational banks, regional and online banks, and small FIs and credit unions alike to identify 100 percent of applicant and beneficiary assets potentially affecting eligibility for benefits. As Appendix 1 of this proposal, PCG has attached a list of the West Virginia regional financial institutions to be included in PCG's proposed traditional, pre-enrollment AVS. Additional financial institutions will also participate should an applicant/beneficiary have an address outside of this region.

Because Accuity has been the ABA Registrar for the American Bankers Association for more than 100 years and due to their pioneering role establishing and operating AVS on behalf of the Social Security Administration's SSI program, Accuity maintains relationships with 100 percent of the depository financial institutions in the United States and PCG proposes to include this FI network in the State of West Virginia's AVS program.

Finally, as the registrar for the American Bankers Association since 1913 currently servicing more than 17,000 financial services clients, Accuity is a well-known and well-respected organization in the banking community and is therefore well-positioned to coordinate between DHHR and the FI community.

Because Accuity is the ABA Registrar, Accuity is always informed when a financial institution closes, merges, or otherwise changes ownership. Accuity maintains a current financial institution enrollment file which can be provided to the State upon request at any time.

The PCG Team's network of financial institutions includes banks, savings and loan companies, credit unions, and any other depository FI and returns the following account types: Annuities; Time/CDs; Checking Accounts; Savings Accounts; Custodial Accounts; Burial or Funeral Accounts; IRAs; Money Market Accounts; Social Security Accounts; Keoughs; Rent Securities; Trusts; and Christmas Club Accounts.

PCG ensures our AVS clients are afforded the ability to perform the most comprehensive search possible for both disclosed and undisclosed applicant and beneficiary assets by providing three distinct, but concurrent, searches for assets, as follows:

**1 National Account Search:** PCG processes all AVS requests through the Early Warning national database of accounts held at the nation's largest approximately 10-15 Financial Institutions (FIs) to identify any account maintained by a consumer at any of the nation's largest FIs anywhere in the United States. These financial institutions represent approximately 50 percent of the depository accounts in the United States and allow PCG to quickly verify the existence of any

applicant/beneficiary account at any of the financial institutions anywhere in the United States. 100 percent of all PCG AVS cases are processed through this national network of financial institutions in order to ensure PCG’s coverage is as comprehensive as possible.

**2 Local Account Search:** Secondly, PCG performs a geo-targeted search of banks which are local to the applicant or beneficiary and therefore represent the greatest likelihood of maintain an owned account. The PCG Team utilizes a geographic search application to identify local and regional FIs most likely to maintain an applicant and/or beneficiary account based on logic such as geographic proximity to the customer’s address. The PCG Team utilizes Accuity’s Geographic Undisclosed Account Radial Detection component, or GUARD, as the mechanism that determines logic by which asset verification requests are to be distributed to FIs. GUARD utilizes various FI databases and proprietary logic to optimize the probability of identifying Financial Institutions specific to a search for financial assets owned by an individual benefits applicant/beneficiary.

The GUARD application provides a means to identify the FI most likely holding assets for Medicaid claimants and beneficiaries. In part, by focusing on FIs with offices closest to the customer, the GUARD application provides a reasonable approximation of the likelihood that a customer would have undisclosed accounts with a particular FI.

The operational efficiency of GUARD searches involves several factors. The following data elements are the criteria which most affect GUARD’s selection of FIs:

Element	Description	GUARD Selection
Distance	Physical distance from the customer’s address to the FI’s location.	Smaller values are ranked higher
Presence	The number of branches the FI has in the same zip code as the customer. Calculated from Accuity’s information for each zip code.	Smaller values are ranked lower
Branches	The FI’s number of Branches across the US. Indicator of the national size of the FI.	Smaller values are ranked lower
Direct Deposits	The FI’s number of SSI Direct Deposit Accounts as an indicator of national ABD population of accounts.	Smaller values are ranked lower

The GUARD algorithm has been developed and refined in concert with the Social Security Administration since 2003 in support of their Supplemental Security Income (SSI) AVS program.

**3 Directed Account Search:** In addition to our national and local account searches, PCG’s AVS will **allow your authorized users to request account look-ups at any specific banks anywhere in the United States**, either via web services calls, batch file transmissions, and/or within the AVS Web Portal.

The combination of our national account detection search, local geo-search, and directed account search ensures the United States’ most comprehensive search for detecting assets maintained by the applicants and beneficiaries.

The PCG Team’s network of financial institutions includes banks, savings and loan companies, credit unions, and any other depository FI and returns the following account types: Annuities; Time/CDs; Checking Accounts; Savings Accounts; Custodial Accounts; Burial or Funeral Accounts; IRAs; Money Market Accounts; Social Security Accounts; Keoughs; Rent Securities; Trusts; and Christmas Club Accounts.

PCG's AVS data provider and subcontractor, Accuity, has a 13-year history of working with financial institutions in the asset verification marketplace. Our comprehensive recruiting approach targets both financial institutions inside the State of West Virginia and the contiguous states.

Accuity has an established system for continuously recruiting FIs in the State of West Virginia and across the United States to join and expand its network. The on-going Financial Institution enrollment effort has the following objectives:

- Build on the established and committed base of Financial Institutions currently participating in Accuity's Asset Verification Financial Institution Network nationally.
- Contact banking organizations as follows:
  - ✓ Inform the contact that Accuity Asset Verification Services Inc. intends to provide asset verification services for the DHHR.
  - ✓ Review procedures for accessing the DHHR-specific asset verification requests.
  - ✓ Confirm the current information stored in Accuity's Financial Institution Database and make necessary revisions.
  - ✓ Encourage each FI to register for Accuity's automated web service in order to expedite response times.
  - ✓ Provide ongoing FI education and support.



PCG and Accuity initiate several activities prior to going live with AVS services to ensure financial institutions are aware of and comfortable with forthcoming AVS activities. In one state, PCG recently met with the heads of the state bankers' association and credit union association to answer questions and address any concerns they had. In another state, PCG and Accuity sent out co-branded introductory letters announcing the program, which included an introduction from our agency client attesting to the legitimacy of the program. Lastly, Accuity operates a financial institution customer service center and training program, each of which ensure financial institutions are supported throughout each AVS engagement. All of these activities support a smooth and seamless implementation of PCG's Medicaid AVS activities.

Because Accuity has been the ABA Registrar for the American Bankers Association for more than 100 years and due to their pioneering role establishing and operating AVS on behalf of the Social Security Administration's SSI program, Accuity maintains relationships with 100 percent of the depository financial institutions in the United States. Therefore, most financial institutions in the United States are currently queried for SSI asset verification via Accuity and are therefore comfortable with and aware of Accuity as a trusted AVS data provider.



PCG is the only vendor who can hit the ground running on day one after award due to the fact that we already have an established FI network of all of the mid-size, regional, and local FIs, as well as the nation's largest FIs maintained by Early Warning.

PCG's proposed financial institution network does not comply with the following requirements requested by the RFQ:

- 5-day Financial Institution Network Update: PCG will submit a monthly report of all financial institutions enrolled in our AVS network, rather than providing updates within 5 days of a change to the list.

### **2.3.4 Liquid Asset Verification**

The PCG Team's Financial Institution Network is trained to provide account balance information for both open and closed accounts for up to 5 years. They are also trained to pay attention to the timelines requested by our clients as the request may include only certain periods during the 5 year look-back period depending on the request type.

During the requirements gathering phase, PCG will work with DHHR to identify the length of the AVS look-back period associated with each request type variation (i.e. program type + application type) – or – PCG can create standard look-back periods to be applied based on other chase characteristics, such as whether the case is a new application or a renewal case. For example, DHHR may want PCG to request 60 months' worth of account balances for most new applications, but only 12 months of account balances for renewal cases, and perhaps only 3 months' worth of account balances for community cases. PCG's rules engine automates this process once requirements have been defined. Regardless of the criteria chosen to determine look-back periods, PCG will program this into our rules engine to ensure that every West Virginia request results in the correct look-back period being generated by financial institutions.

As detailed in previous sections, PCG will process each AVS request through the following financial institutions:

1. National Network – PCG will search for the existence of owned accounts at every branch in the United States which are associated with the nation's largest financial institutions, such as Wells Fargo, BB&T, Bank of America, and more.
2. Local Network – PCG will search for the existence of owned accounts at between 10-15 financial institutions located near the applicant/member's address. Further, should any of these 10-15 financial institutions have other branches or associated financial institutions anywhere else in the United States, these financial institutions will also be searched.
3. Directed Account Search – PCG will search for owned accounts at any financial institution in the United States, as directed by the worker.

The combination of the 3 account search tools ensures there are no "safe havens" where consumers can hide assets.

The PCG Team's network of financial institutions includes banks, savings and loan companies, credit unions, and any other depository FI and returns the following account types: Annuities; Time/CDs; Checking Accounts; Savings Accounts; Custodial Accounts; Burial or Funeral Accounts; IRAs; Money Market Accounts; Social Security Accounts; Keoughs; Rent Securities; Trusts; and Christmas Club Accounts.

For those responses where an account was identified – regardless of whether it is currently open or closed - the response will include: request ID; financial institution name; account branch name; account branch address; account owner(s); account type(s); open/close dates; first minute of the month account

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balances for every month of the look back period. Additionally, PCG will include any data received in the original request (e.g. case number, case type, etc.) with our AVS response. Further, for property responses received from LexisNexis, PCG will also identify any property or real estate owned by applicants/beneficiaries during the previous 5 years.

If DHHR identifies “known” bank accounts in the AVS request sent to PCG, PCG can also identify whether bank accounts discovered through the AVS were previously disclosed or undisclosed.

PCG has provided a complete description of our asset verification service in section 2.3 of this proposal.

PCG’s proposed liquid asset verification service does not comply with the following requirements requested by the RFQ:

- Asset Verification Report Details: PCG’s asset verification responses include all of the requested data points, with the exception of the financial institution phone number.

### **2.3.5 Real Property Asset Verification**

The PCG Team will leverage LexisNexis’s data repository of public records and commercially available data to identify Real Property. The LexisNexis repository is the largest and fastest-growing such repository in the country, and links together in excess of 44 billion records drawn from over 10,000 disparate sources, accounting for 700 million unique identities. Data sources are refreshed daily, meaning that the information that will be provided is no older than this morning. In addition to the current data store, an average of 30 million raw files are processed daily, continually adding to the breadth of information available to DHHR.

Using the LexisNexis core strengths of unrivaled data sets, identity linking, and highly scalable technology, the LexisNexis Benefit Assessment Solution allows DHHR to confidently access the most comprehensive and relevant property data during your Medicaid enrollment process.

The LexisNexis Benefit Assessment is driven by an extensive core database and a proprietary linking technology. DHHR will be able to apply massive amounts of data in an accurate and efficient manner and receive verified, accurate data relevant for your mission. Benefits Assessment allows for single, multiple, or mass queries providing systematic delivery of the data that is most important to you in identifying and verifying real property.

With over 3.2 billion property records, LexisNexis property data includes assessment records from 52 states and territories, some going back to the 1970s, and deed and mortgage records from 50 states, with some dating back as far as 1900.

Using the LexisNexis Benefit Assessment solution, PCG will:

- 3) Resolve to the identity
- 4) Return comprehensive, current and historical property information associated to the individual:
  - a. Property location information (current and prior)
  - b. Owner/co-owner names
  - c. Seller(s) names
  - d. Transaction dates
  - e. Value: purchased price, sales price, assessments, mortgage/loan amount, market value
  - f. Deed type (quitclaim, interfamily transfer, etc.)
  - g. Number of properties owned
  - h. Return relevant data up to and beyond 60 months

PCG uses LexisNexis' vast property data sources comprised of deed, mortgage, and assessment data from across the United States. In addition to receiving property records for the state of West Virginia, LexisNexis also updates and maintains historical property data for 51 states and territories including Washington, DC. This access provides the ability to identify property that is owned outside of West Virginia and its neighboring states, thus creating a more comprehensive picture of the applicant.

Regardless of the request transmission method chosen by our clients, multiple processes are used concurrently to identify all of the property assets maintained by applicants and beneficiaries:

5. **Deed Search:** PCG processes all AVS requests through the LexisNexis deed database containing millions of records updated on a bi-weekly basis and every time a property is purchased or sold.
6. **Mortgage Search:** PCG processes all AVS requests through the vast LexisNexis mortgage database containing millions of records updated on a bi-weekly basis and every time a property is purchased or sold.
7. **Assessment Search:** PCG processes all AVS requests through the LexisNexis assessment database containing millions of records updated on an annual basis or every time an assessment is completed.
8. **Liquid Asset Search:** PCG also processes all AVS requests through our financial AVS data partner's network of 100 percent of the financial institutions in the United States. PCG's ability to combine property and liquid asset searches into a single solution truly distinguishes us from our competitors.

The combination deed, mortgage, and assessment searches, and LexisNexis' ability to link disparate and incomplete records to applicants' identities, ensures the most comprehensive net for detecting assets maintained by the State's applicants and beneficiaries.

PCG provides the following data elements within our Real Property Verification response:

Data Element	Description
Currently Owned Property or Properties	Identify each currently owned property.
Currently Owned Property Address	Identify the physical address of each currently owned property.
Assessed Property Value	Identify the assessed property value of each currently owned property based on the most recent assessment.
Market Property Value	Identify the most current market value of each currently owned property.
Deed State	Identify the state in which the deed was registered for each currently owned property.
Deed Type	Identify the type of deed which was registered for each currently owned property.
Deed County	Identify the county in which the deed was registered for each currently owned property.
Lender Name	Identify the lender for each currently owned property.

Data Element	Description
Contract Date	Identify the contract date reflecting when the home was purchased for each currently owned property.
Deed Sale Price	Identify the purchase price of each currently owned property according to the deed record.
Buyer Name	Identify the buyer of each currently owned property. Can be either an individual or a company.
Owner Name	Identify the current owner of each currently owned property.
Seller Name	Identify the seller of each currently owned property. Can be either an individual or a company.
Previously Owned Property or Properties	Identify each previously owned property.
Previously Owned Property Address	Identify the physical address of each previously owned property.
Previously Owned Assessed Property Value	Identify the assessed property value of each previously owned property based on the most recent assessment.
Previously Owned Market Property Value	Identify the most current market value of each previously owned property.
Previously Owned Deed State	Identify the state in which the deed was registered for each previously owned property.
Previously Owned Deed Type	Identify the type of deed which was registered for each previously owned property.
Previously Owned Deed County	Identify the county in which the deed was registered for each previously owned property.
Previously Owned Lender Name	Identify the lender for each previously owned property.
Previously Owned Contract Date	Identify the contract date reflecting when the home was purchased for each previously owned property.
Previously Owned Deed Sale Price	Identify the purchase price of each previously owned property according to the deed record.
Previously Owned Buyer Name	Identify the buyer of each previously owned property. Can be either an individual or a company.
Previously Owned Owner Name	Identify the current owner of each previously owned property.
Previously Owned Seller Name	Identify the seller of each previously owned property. Can be either an individual or a company.
Flagged Deed Type	Identify any property which was sold with a “Quick” or “Quit” claim deed type within the 60 months prior to application.

If DHHR identifies “known” properties in the AVS request sent to PCG, PCG can also identify whether properties discovered through the AVS were previously disclosed or undisclosed.

### 2.3.6 Reporting

PCG's AVS Web Portal features a reporting dashboard which allows authorized user roles to generate standard or customized reports, as follows:

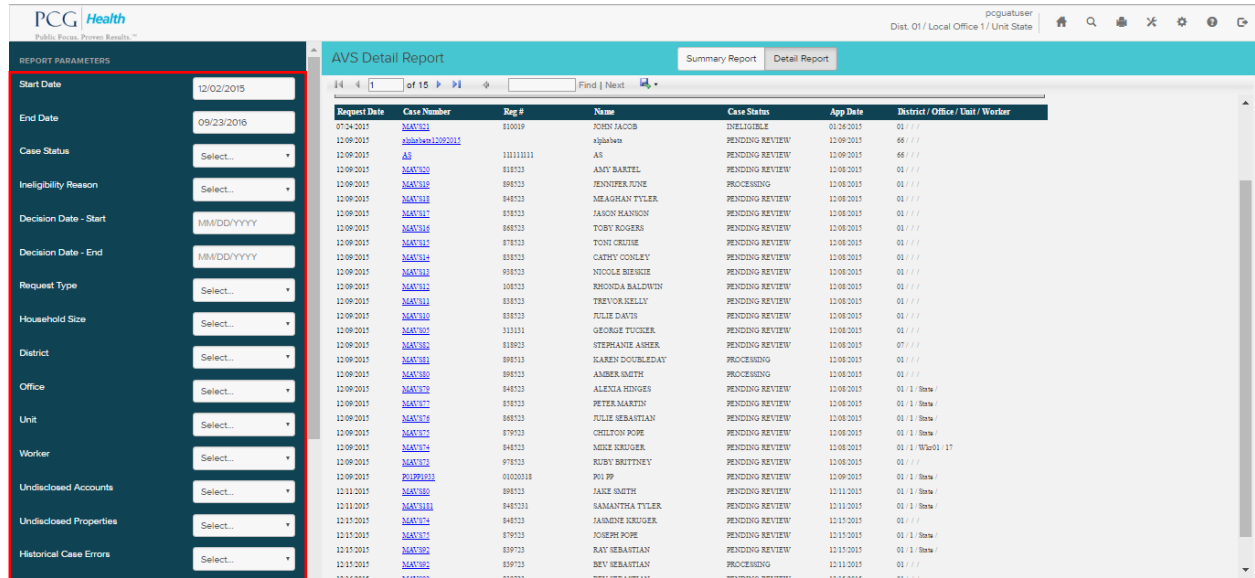
#### Standard Reports

- **Case Error Report:** features all case errors within a given county, office, unit or time frame, including missing required fields, invalid data format, program error, invalid SSN, invalid DOB, and cannot validate identity per FI.
- **Site Access Audit Report:** identify users who log in and out of AVS.
- **Case Access Audit Report:** capture the cases users access and when.
- **Ad hoc Request Audit Report:** log those Ad Hoc AVS requests submitted and by whom.

Standard Report Customization Criteria and Output Elements		
Report	Criteria Selection Options	Output Elements
Case Error Report	Start/End Date Range	County
	County	Office
	Office	Unit
	Unit	Worker
	Worker	Registry Number
	Record Status (i.e. Error Type)	Case Number
		Case Name
		Request Date
Description		
Site Access Audit Report	Start/End Date Range	County
	County	Office
	Office	Unit
	Unit	Worker
	Worker	Login Time
		Logout Time
Session Time		
Case Access Audit Report	Start/End Date Range	Case Number
	County	County
	Office	Office
	Unit	Unit
	Worker	Worker
	Case Number	Case Access Time
Ad Hoc Access Audit Report	Start/End Date Range	County
	County	Office
	Office	Unit
	Unit	Worker ID
	Worker	Case Number
	Ad Hoc Request Type	Request Date/Time
		Status
		Applicant Type
		Request Type
Full Name		
	Last 4 SSN	

Case Number

**Custom Reports**



**AVS Web Portal Reporting Dashboard**

Additionally, within our AVS Web Portal, PCG features a sophisticated reporting dashboard with comprehensive, user-driven reporting available at both summary and detail levels. Nearly any data element within the AVS can be configured to be included within the reporting parameters users can select to generate a nearly unlimited combination of reports. This page allows for both summary and detail level reports to be customized based on user-selected criteria at the push of a button.

Custom Report Customization Criteria and Output elements	
Report Criteria	Drop-Down Options
Start/End Date Range	Calendar Start and End Date Selection
Case Status	New
	Error
	Processing
	Pending Review
	Review in Progress
	Ineligible
	Eligible
Ineligibility Reason	Over Resources – Financial Accounts
	Over Resources – Real Property
	Over Resources – Real Property and Financial Accounts
	Other
Decision Date Range	Calendar Start and End Date Selection
Request Type	Agency-specific program and/or category designations
County	TBD
Office	TBD
Unit	TBD

<b>Worker ID</b>	TBD
<b>Undisclosed Accounts</b>	Yes
	No
<b>Undisclosed Properties</b>	Yes
	No
<b>Historical Case Errors</b>	Yes
	No
<b>AVS Summary</b>	1 – Under Resources
	2 – Over Resources
<b>Transfer Flag</b>	Yes
	No
<b>Property Flag (in development)</b>	Yes
	No
<b>Excluded Account Flag</b>	Yes
	No
<b>Case Entry Type</b>	Batch
	Ad-Hoc
<b>Case Type</b>	Application
	Renewal

PCG can further enhance both our reporting service to identify liquid and/or real property assets attested to by benefits applicants and members as long as this data is transmitted to PCG from DHHR.

***Ad Hoc Reports***

PCG agrees to create and submit any ad hoc reports and/or additional reports requested by DHHR for the duration of this engagement. PCG will generate reports upon request and will provide these reports to DHHR in the format of your choosing. A demo of PCG’s Reporting Dashboard is available upon request.

***Scheduled Reports***

In addition to PCG’s self-service Reporting Dashboard, PCG will also provide monthly summary reports within five (5) business days following the end of each month.

PCG’s monthly summary report will include the following report criteria:

- ✓ Performance data and metrics;
- ✓ Compliance with contract requirements;
- ✓ Status of identified risks, mitigation strategies and activities, and contingency plans;
- ✓ Issues, resolution of issues, including the length of time from discovery to resolution;
- ✓ Detailed description of all major systems outages and incidents, including the incident, when and how it was discovered, system and operational impacts, and corrective measures to detect and prevent future major systems outages/incidents; and
- ✓ Summary data of quality management activities conducted.

In addition to the summary report details, PCG will also provide a monthly management report. This report will include the following detailed information:

<b>Monthly Management Report</b>	
<b>Transaction Report</b>	This section will detail the number of transactions, responses, responses with accounts, responses with properties, and more
<b>AVS Availability Report</b>	This section will detail system uptime and performance

<b>AVS Performance Report</b>	This section will detail property response times by month and average daily response times.
<b>AVS Customer Service Metrics</b>	This section will detail the help desk’s activities, call volumes, and performance.
<b>High Value Property Report</b>	This section will identify every property found valued at more than \$100,000
<b>Disqualifying Property Transfer Report</b>	This section will identify every property which was sold for less than 80% of market value in the five years prior to application
<b>AVS Financial Institution Report</b>	This report will detail financial institution participation rates, accounts discovered, and response rates

PCG understands that regular two-way communication is critical to the success of any AVS implementation. PCG’s Project Manager, Peter Cheesman, will lead weekly project status meetings and be responsible for reporting on PCG’s activities and progress, identifying the status of any known and/or new risks and the corresponding mitigation strategies for addressing the risk, and addressing any agency questions, concerns, and/or agenda items.

Also, these weekly meetings will result in reports that summarize each activity area as appropriate:

<b>Weekly Project Status Meeting Reports</b>	
PCG will report on the status of transition activities, including work plan adherence, milestones, action items, and more	
PCG will report on the status of operations, transaction processing, volumes, and system security, maintenance and support activities.	
PCG will report on the status of the development of training materials and the coordination and execution of trainings.	
PCG will provide updates on user support activities, including inquiry volumes, number of user issues by type of issue, and issue resolution statuses.	

In addition to providing weekly and monthly status reports during implementation,

Finally, in addition to PCG’s scheduled reporting, PCG will also submit the following deliverables to DHHR for review and approval. All deliverables will be updated at least annually and resubmitted.

<b>Deliverable</b>	<b>Description</b>
<b>Implementation Plan</b>	Steps, milestones, and due dates critical to PCG’s implementation and operation of AVS in the State of West Virginia.
<b>Work Breakdown Structure</b>	Detailed work steps required for the successful implementation and operation of PCG’s AVS.
<b>Disaster Recovery and Business Continuity Plan</b>	Description of PCG activities and protocols to be followed in the event of a disaster and/or other unexpected disruption in service.
<b>Communications Plan</b>	Description of the communication methods, schedule, technology and distribution list PCG will use to communicate with DHHR.
<b>Risk Management Plan</b>	Risk analysis of all identified risks, including project impact, mitigation strategies, and alternative solutions.
<b>List of Participating Financial Institutions</b>	List of all financial institutions participating in PCG’s AVS.
<b>AVS User Guide</b>	Description and graphics illustrating how State workers will access and interact with PCG’s AVS.



<b>Turnover Management Plan</b>	Description of turnover activities detailing all turnover tasks and activities.
<b>Change Control Plan</b>	Plan for documenting, approving and executing requested system changes.
<b>Training Plan</b>	Description of all training activities, materials and scheduling.
<b>Staffing Management Plan</b>	Plan for managing staff time, allocating resources, and replacing key staff members, if necessary and approved by DHHR.
<b>Documentation Management Plan</b>	Document delivery, updating, and retention policy.
<b>Testing Management Plan</b>	Plan detailing testing activities, acceptance criteria, and support.
<b>Data Retention Management Plan</b>	Plan detailing approach and timeline for retaining project data.
<b>Security Management Plan</b>	Document detailing AVS security requirements and methods for meeting these requirements.
<b>Workflow Management Plan</b>	Plan for setting up, executing and monitoring defined AVS tasks, arranged as a workflow.
<b>Problem Management Plan</b>	Document detailing approach to monitoring performance, identifying and resolving incidents, and escalating issues, as necessary.

**2.3.7 Training and Support**

**Training.** PCG’s approach to training is based on years of experience. Using tested training materials and user guides, we have successfully trained tens of thousands of stakeholders during thousands of sessions, forums, and one-on-one calls and web-based trainings. Additionally, PCG provides customer service and technical support services to dozens of health and human services agencies nationwide.

The following schedule represents an approximate timeline for major training events to occur. These events are dependent on several factors, including the implementation of the AVS and the availability of agency staff prior to go live. PCG provides onsite trainings, as necessary, as well as train-the-trainer when preferred; both of which are supported by subsequent onsite and Web-based trainings, as well remote availability and support.

<b>Weeks Before Go Live</b>	<b>Activity</b>	<b>Description</b>	<b>Location</b>
- 8	Scheduling	PCG will work with the agency to schedule in-person supervisor and user trainings and finalize approach.	Onsite
- 8	Communications	PCG will submit training materials and the AVS use guides to the agency for review and approval.	N/A
- 6	Communications	PCG will send invites and disseminate training materials and the AVS user guides to applicable staff, as directed by the agency.	N/A
- 4	Trainings	PCG will execute in-person key staff and supervisor trainings on and demonstrations of the AVS. Trainings will also be available live via WebEx and will be recorded for those who wish to view it remotely or at a later date.	Onsite
-4 to -2	Trainings	PCG will execute in-person worker trainings followed by “elbow” trainings at worker stations.	Onsite

Weeks Before Go Live	Activity	Description	Location
- 4 to - 2	Live Support	PCG provides additional onsite training and support at pilot and/or user locations, as necessary.	Onsite
- 1	Help Desk Support	PCG's AVS Help Desk goes live and is available to provide on-demand user support.	N/A
Ongoing	Remote Support	PCG provides remote phone, Web, and email support, as necessary.	N/A
Ongoing	Live Support	PCG provides onsite training and support at various county office locations, as necessary.	Onsite
Ongoing	Web Support	PCG makes training materials, FAQs, announcements, and updates available for download.	N/A

Live trainings will be composed of a “classroom training,” during which we will introduce the AVS and provide instructions on how to access the AVS and navigate within the system. Using PCG team members the entire training can be completed in a two-hour session. PCG will work with the agency to organize and schedule the live trainings.

PCG will also host various WebEx trainings for case workers and supervisors, as necessary. PCG will also offer additional guidance, including training materials, user guide, and videos of prior WebEx trainings.

PCG will work with the agency to author and distribute training materials to eligibility staff. Training materials include:

- ✓ **AVS User Guide:** This document will outline the activities necessary to access and operate the AVS, in addition to describing the data included within the AVS.
- ✓ **Frequently Asked Questions:** The FAQ document will highlight any commonly asked questions and their answers. Topics to be covered will include: workflow, business processes, help desk contacts, operational protocols, and more.
- ✓ **AVS Training Video(s):** PCG will record staff trainings and make these recordings available.

In addition to making training materials available, PCG will provide on-demand remote support via our Help Desk.

**Support.** During the implementation and throughout the operational process, AVS users may have questions and require phone support related to the use of the AVS. PCG offers the following support options, the combination of which ensure the agency and its workers are supported through transparent and timely service throughout this engagement:

Support Type	Description
Bug / Technical Support	PCG offers live technical support available via phone and email. All reported technical issues are tracked within PCG's Team Foundation Server (TFS) issue resolution software, which can be accessible to the agency. PCG offers a dedicated support email address and phone number to allow IM workers to report system and data errors. PCG technical support professionals can coordinate with agency staff workers, as necessary, to ensure timely and satisfactory resolutions to worker issues and/or concerns.

Support Type	Description
AVS Financial Institution Support	PCG offers live phone and email support related to agency financial institution concerns and/or discrepancies, available to all agency workers and supervisors during all normal business hours.
Project Management Support	PCG's project manager and associate project manager are available via phone and email at any time should agency management have questions or concerns. These project managers are also available for in-person consultations at any time with reasonable notice.
Financial Institution Technical Support	PCG provides live technical support to financial institutions participating in PCG's AVS. This support is available via phone and email during normal business hours. PCG financial institution support professionals can coordinate with agency staff workers, as necessary, to ensure timely and satisfactory resolutions to worker issues and/or concerns.

Call volumes and resolution statuses of any issues submitted to any of PCG's help and support personnel will be logged and reported on within PCG's monthly project status reports.

To ensure users can easily and conveniently retrieve information and ask questions, PCG utilizes an advanced help desk infrastructure, including a dedicated, fully staffed help desk available to users via phone and email during normal business hours.

PCG's AVS Help Desk will be available for the duration of the engagement during normal business hours. PCG currently maintains a call center facility to field incoming Help Desk and technical support calls and to make outgoing follow-up resolution calls, as necessary. Utilizing a dedicated toll-free number and dedicated, trained AVS specialists, PCG will ensure your users are supported at all times.

With extensive experience in managing and operating call centers in several states across the country for more than 15 years, PCG can immediately staff this project with experienced Help Desk specialists, each of whom has at least three years of Help Desk experience. To ensure the professional, informed handling of customer queries, comments, and complaints, PCG maintains the following help desk protocols:

- ✓ **Help Desk Staffing** – PCG will staff dedicated Help Desk representatives allowing us to comfortably receive, record, and track any incoming calls.
- ✓ **Hours of Operation** – PCG's Help Desk will be open throughout the engagement on Mondays – Fridays during normal business hours. PCG's Help Desk will be closed on government holidays.
- ✓ **Call Documenting** – PCG Help Desk representatives will document the subject of each incoming call to ensure a timely resolution.
- ✓ **Call Escalation** – Requests and/or queries that cannot be handled by the representative will be forwarded to the account supervisor. While Help Desk associates are trained to handle a myriad of customer queries, occasionally queries will require additional attention. Rather than waiting for potential call escalation and user frustration, PCG takes premeditative action to inform and accommodate the affected user population, including: clear and informative user training supported by user guides and training literature; Help Desk staff training; project manager involvement; and scripted responses to frequently asked questions. When a situation does escalate, a supervisor is immediately alerted and either joins or takes over the call.
- ✓ **After-Hours Inquiries** – PCG responds to after-hours inquiries immediately upon receiving the following day, including inquiries from e-mails, voice-mails, and faxes.

Additionally, PCG offers a dedicated Financial Institution Hotline, open during all normal business hours, which will allow your workers to submit real-time questions or concerns related specifically to financial institutions, accounts, and/or account balances provided by the AVS.

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## 3. Service Level Agreements

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### **3. SERVICE LEVEL AGREEMENTS**

Pending final discussion and review, PCG agrees to DHHR's documented service level agreements as defined in the RFP provided tardiness due to DHHR delays or other, similar delays outside of PCG's control are excepted.

However, PCG requests that SLA 005: Reporting be modified to allow for 5 days following the end of the month to deliver Monthly Reports. This will ensure that all data during the month can be gathered and properly analyzed and reviewed prior to submission. PCG also requests that the weekly report delivery requirement be 5 p.m. each Monday.

PCG also requests that SLA 003: Operations Issue Management and SLA 01: AVS Service Availability be combined into a single SLA, as these appear to be redundant and will result in charges from each SLA in the event either SLA is breached.

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## 4. Vendor Qualification

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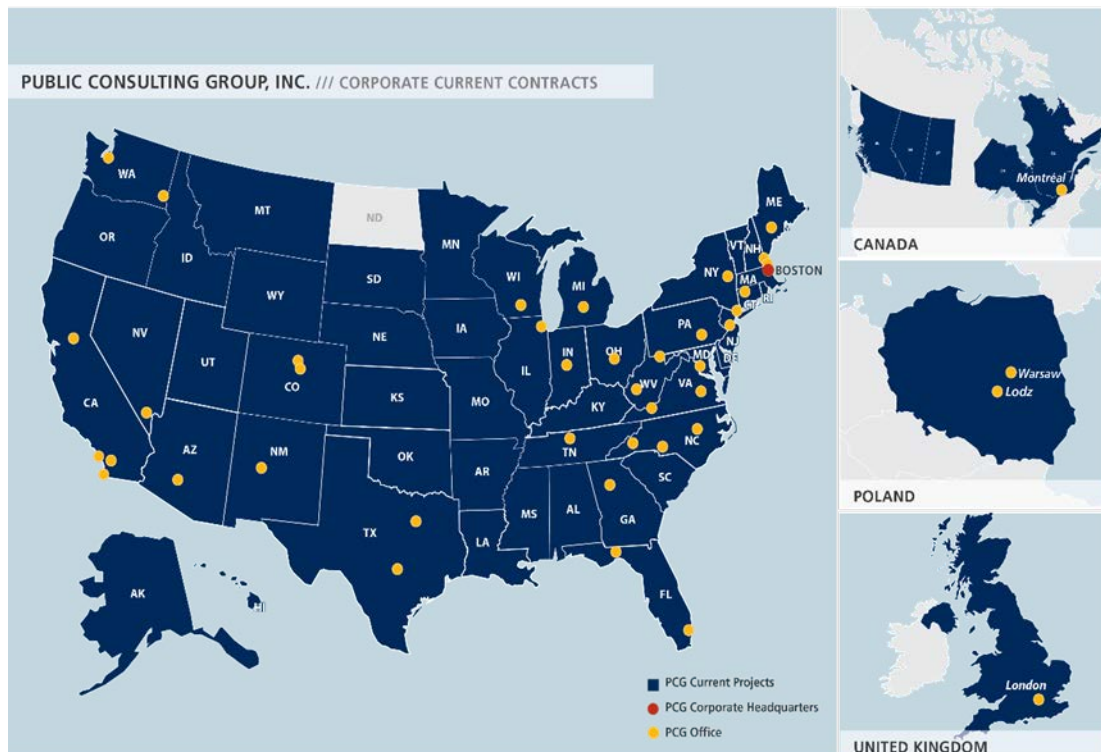
## 4. VENDOR QUALIFICATION



Public Consulting Group, Inc. (PCG) is a professional services management and operations consulting firm that primarily serves public sector health, human services, education, and other state, county, and municipal government clients. Established in 1986 with headquarters in Boston, Massachusetts, PCG, a privately owned company has over 2,000 professionals and operates 60 offices in the United States, Canada, and Europe. PCG holds active contracts today in every state and is currently working for more than 40 Medicaid agencies and hundreds of health and human services agencies.

Because PCG has dedicated itself almost exclusively to the public sector for 30 years, the firm has developed a deep understanding of the legal and regulatory requirements and fiscal constraints that often dictate a public agency's ability to meet the needs of the populations it serves. We have helped numerous public sector organizations design and evaluate systems, maximize resources, make better management decisions using performance measurement techniques, improve business processes, assist with federal and state compliance, and improve client outcomes.

Because PCG has been almost exclusively dedicated to the public sector for years, the firm has developed a deep understanding of the legal landscape, regulatory requirements and fiscal constraints that often dictate a public agency's ability to meet the needs of the populations it serves. We have helped numerous public sector organizations maximize resources, make better management decisions using performance measurement techniques, improve business processes, address federal and state compliance, and improve client outcomes. Many of PCG's 2,000 employees have extensive experience and subject matter knowledge in a range of government-related topics. PCG has current contracts in 49 of the 50 states, as outlined in the map on the following page.



*PCG Current Contracts*

The PCG team for this engagement represents many years of experience dealing with health and human services agencies – including eligibility, benefit, human service, and cost reporting and federal claiming functions – for programs such as Medicaid, CHIP, Medicare, SNAP, TANF, SSI and child care. Knowledge of these and other federal programs, our team members approach revenue maximization with an entrepreneurial spirit and a solution-oriented frame of mind. While many team members bring program-specific knowledge, all have a rich understanding of the public sector and well-developed consulting skills, including project management, business analysis, and eligibility verification.

PCG is organized into five practice areas. Our PCG Health practice area will lead this particular engagement.

## PCG | Health

Public Focus. Proven Results.™

PCG Health helps state, local, and municipal health agencies respond optimally to reform initiatives, restructure service delivery systems to best respond to regulatory change, maximize program revenue, and achieve regulatory compliance. The practice area uses industry best practices to help organizations deliver quality services with constrained resources, offering expertise in strategy and finance, revenue cycle management, and payer support services. PCG Health is a recognized leader in member eligibility systems and services; a leader in health care reform and health benefits exchange consulting; a leading provider of revenue enhancement, rate setting, and cost settlement services; and a leading provider of health care expense management services. Currently, PCG Health has projects in 40 states and the District of Columbia and currently serves 37 state Medicaid agencies.

## PCG | Human Services

Public Focus. Proven Results.™

PCG Human Services helps state, county, and municipal human services agencies to achieve their performance goals in order to better serve populations in need. The practice area's seasoned professionals offer proven solutions to help agencies design programs, services, and systems; increase program revenue; cut costs; and improve compliance with state and federal regulations. PCG Human Services is a proven national leader in management consulting services for state Temporary Assistance for Needy Families (TANF) programs, state child welfare and juvenile justice programs, workforce investment boards, Social Security advocacy management, early childhood programs, and state Supplemental Nutrition Assistance Programs (SNAP).

## PCG | Technology Consulting

Public Focus. Proven Results.™

PCG Technology Consulting (PCG TC) offers a full spectrum of IT services to help government agencies at every stage of the IT life cycle. Services include IV&V and Quality Assurance, enterprise and technical architecture assessments, project management, procurement support, requirements definition, feasibility studies, application development, management consulting, disaster recovery and business continuity planning, security assessments, and infrastructure support services. The addition of these IT services puts PCG in a unique position to be able to offer clients specialized IT services with the various programmatic perspectives provided by our other practice areas.

## PCG | Education

Public Focus. Proven Results.™

Combining management consulting experience with significant K-12 educational domain expertise, PCG Education offers consulting solutions that help schools, school districts, and state education agencies/ministries of education promote student success, improve programs and processes, and optimize financial resources. Together with its state-of-the-art technology, PCG Education's consulting approach helps educators make effective decisions by transforming data into meaningful results. PCG Education has current projects in 40+ states and four Canadian provinces and serves 18 of the 25 largest U.S. school districts. Its special education management systems – including EasyIEP™, GoalView™, and iep.online™ – serve more than 1.6 million special education students across the U.S. PCG Education has also recovered over \$4.7 billion in federal Medicaid funds for school district clients, more than any other offeror.





Public Focus. Proven Results.™

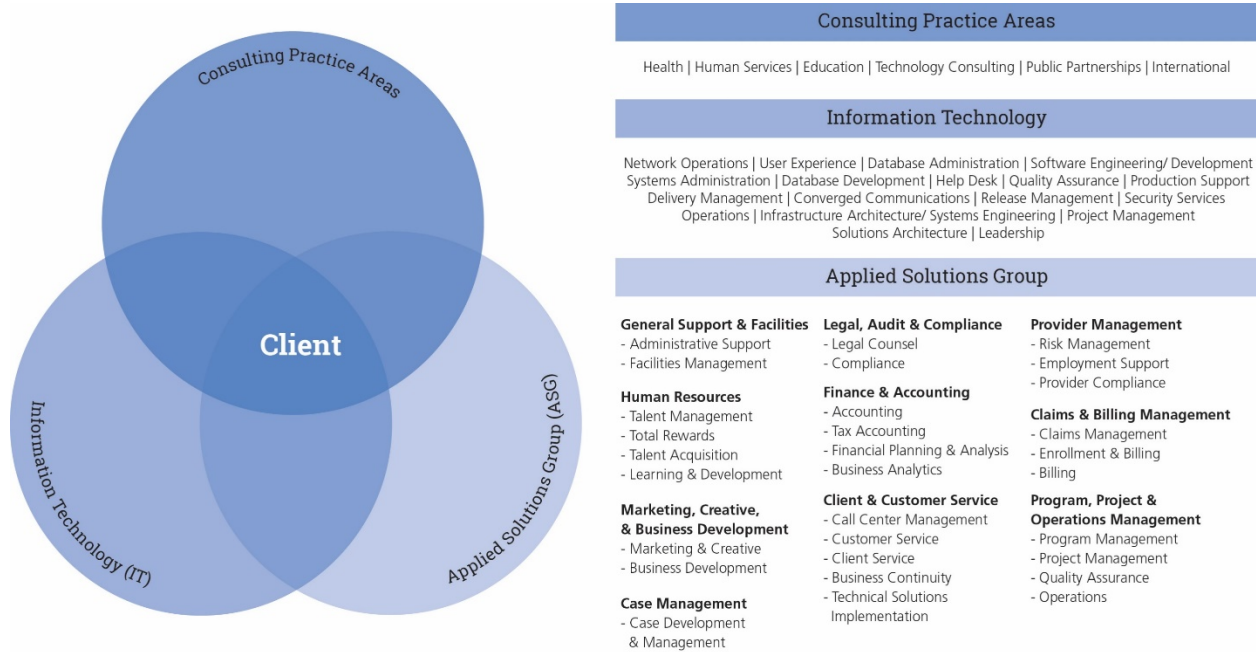
PCG Public Partnerships (PPL) was initially formed to provide assistance to the Robert Wood Johnson Foundation's national pilot demonstrations in self-determination. The practice area offers a rich array of fiscal intermediary and related administrative services to public agencies and participants seeking to develop participant-directed services and supports. Currently, PPL assists more than 32,000 consumers in 20 states, and serves:

- Persons with development disabilities
- Children identified with serious emotional disturbances and their families
- Adults and elders at risk of nursing home placement
- Children and adults in protective services

PCG is a privately held S Corporation managed through five practice areas, each which are run by Practice Area Directors (PADs): Health, Human Services, Technology, Education, and Consumer Directed Services (i.e., "Public Partnerships"). These PADs maintain responsibility, accountability, and authority for overall project management, client relations, and business development, and are supported by a corporate infrastructure that includes a Chief Financial Officer, a Chief Information Officer, and General Counsel, as well as various support units (e.g., Compliance, Human Resources, Marketing, etc.). The President/CEO maintains an active, hands-on presence across the entire firm.

PCG serves our clients on a wide variety of public sector engagements from 60 offices around the United States, Canada, and Europe.

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*Public Consulting Group Services Overview*



Public Focus. Proven Results.™

The PCG Practice Area (PA) responsible for this engagement is PCG Health. PCG Health helps state and municipal health agencies to respond optimally to reform initiatives, deploy large-scale IT systems, restructure service delivery models to best respond to regulatory change, maximize program revenue, and achieve regulatory compliance. The practice area uses industry best practices to help organizations deliver quality services with constrained resources, offering expertise in systems design, benefits consulting, state health policy, revenue cycle management, and payer support services.

Public Consulting Group, Inc. (PCG)'s Health practice area is the **recognized national leader in asset verification systems and solutions**. PCG has successfully supported dozens of states' health and human services agencies in realizing literally hundreds of millions of dollars in cost savings with our AVS. By introducing automated asset verification systems and solutions, PCG can assist the State in using both national and local asset verification data and actionable predictive analytics to ensure the pre- and post-enrollment integrity of your Medicaid and SNAP membership files.

The following projects are representative of PCG's experience and expertise providing asset and eligibility verification services used to maximize cost savings while addressing specific agency needs and requirements:

Project	Client	Project Description
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Project	Client	Project Description
<p><b>Data Broker Services</b></p>	<p><b>Texas Health and Human Services Commission</b>  <i>2016 – Present</i></p>	<p>PCG was engaged to integrate nearly 50 federal, state and commercial verification data sources into the nation’s most comprehensive benefits eligibility decision support solution accessible through PCG’s proprietary eligibility verification data hub. PCG processes real-time eligibility requests through each of our data interfaces to obtain critical identity, income, household composition, asset, residency, property, citizenship, death, and incarceration status information and uses our proprietary rules engine to automate the use of all of this data to predict eligibility and detect fraud.</p> <p>PCG is connecting eligibility workers with more data and analytics than is available anywhere else in the United States, including establishing interfaces with: LexisNexis Identity Authentication and Verification; Equifax The Work Number; Experian Credit and Fraud Shield; Accuity Asset Verification; SSA; IRS; DHS SAVE; TX DMV; FNS eDRS; OCSE; NDNH; TX Workforce Commission; PARIS; public employee retirement systems; TX Lottery Commission, and dozens more.</p>
<p><b>Asset Verification and Real Property Resource Verification System</b></p>	<p><b>New York Department of Health</b>  <i>2014 – Present</i></p>	<p>PCG managed the design, implementation and operation of an eligibility verification web application linking Medicaid applicants and recipients with the financial and property resources they own to enhance the agency’s ability to make resource-based eligibility determinations and redeterminations.</p> <p>PCG integrated Accuity Asset Verification financial institution data and LexisNexis real property data into our automated solution and customized our rules engine to identify resources exceeding program limits, flag disqualifying asset transfers, and alert workers to suspicious or actionable “case clues” potentially affecting the resource-based eligibility of the State’s Long Term Care populations.</p>
<p><b>Asset Verification Services</b></p>	<p><b>Colorado Department of Health Care Policy &amp; Financing</b>  <i>2017 – Present</i></p>	<p>PCG is managing the integration of PCG’s asset verification services’ financial institution data into the Colorado Benefits Management System. The combined solution allows eligibility workers to request data featuring 60 months’ worth of account balances from 100 percent of the nation’s financial institutions in real-time in order to determine the eligibility of Aged, Blind, and Disabled applicants and beneficiaries.</p>
<p><b>Asset Verification System</b></p>	<p><b>Oklahoma Health Care Authority</b>  <i>2014 – Present</i></p>	<p>PCG designed and deployed a Web-based, automated asset verification system to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD) applicants and beneficiaries. This configurable, automated eligibility decision support and case management system integrates data from Accuity’s national network of financial institutions into the PCG-developed Web application to allow eligibility workers to quickly and seamlessly obtain asset verification results,</p>

Project	Client	Project Description
		identify potentially ineligible recipients and applicants, flag fraud, and generate custom reports.
<b>Asset Verification Services</b>	<b>North Carolina Division of Medical Assistance</b>  <i>2013 – Present</i>	PCG managed the integration of Accuity Asset Verification’s financial institution data into the State’s new integrated eligibility system (NCFAST). The combined solution allows eligibility workers to request data featuring 60 months’ worth of account balances from 100 percent of the nation’s financial institutions in real-time in order to determine the eligibility of Long Term Care applicants and beneficiaries.
<b>Asset Verification Services</b>	<b>New Jersey Department of Human Services</b>  <i>2015 – Present</i>	PCG managed the integration of Accuity Asset Verification’s financial institution data into the State’s eligibility system. PCG’s AVS solution allows eligibility workers to request data featuring 60 months’ worth of account balances from 100 percent of the nation’s financial institutions in real-time in order to determine the eligibility of Medicaid Aged, Blind, and Disabled (ABD), Long Term Care, Community, Buy-In, and Waiver applicants and beneficiaries.
<b>Asset Verification and Real Property Resource Verification System</b>	<b>New York City Human Resources Administration/Department of Social Services (HRA/DHR)</b>  <i>2014 – Present</i>	PCG managed the design and implementation of an eligibility verification solution linking Medicaid applicants and recipients with the financial and property resources they own. PCG linked our AVS web application to asset data and real property data and application to feature predictive risk scoring, disqualifying asset transfer flagging, decision support solutions, a self-service reporting dashboard, and configuration options.
<b>Asset Verification Services</b>	<b>Massachusetts Executive Office of Health and Human Services</b>  <i>2016 – Present</i>	PCG implemented our Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD), Long Term Care, Community, Buy-In, and Waiver applicants and beneficiaries. This configurable, automated eligibility decision support and case management system integrates data from financial institutions into the PCG-developed AVS Web Portal to allow eligibility workers to quickly and seamlessly obtain asset verification results, identify potentially ineligible recipients and applicants, flag fraud, and generate custom reports.
<b>Asset Verification Services</b>	<b>District of Columbia Department of Human Services</b>  <i>2016 – Present</i>	PCG implemented our Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries by accessing financial institution data.
<b>Asset Verification Services</b>	<b>South Dakota Department of Social Services</b>  <i>2016 – Present</i>	PCG is implementing our Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries.
<b>Asset Verification</b>	<b>Maryland Department of Human Resources</b>	PCG is managing the design and implementation of an asset and property verification solution which includes

Project	Client	Project Description
Services	<b>2017 – Present</b>	financial institution data from Accuity and property data from LexisNexis. PCG integrated this data into our Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the asset and property resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries.
Asset Verification Services	<b>Montana Department of Public Health and Human Services</b>  <b>2017 – Present</b>	PCG was selected to manage the implementation our asset data from our financial institution network into PCG’s Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the asset resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries.
Asset Verification Services	<b>Delaware Division of Medicaid and Medical Assistance</b>  <b>2017 – Present</b>	PCG was selected to manage the design and implementation of an asset and property verification solution which includes financial institution data from Accuity and property data from LexisNexis. PCG integrated this data into our Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the asset and property resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries.
Asset Verification Services	<b>Wisconsin Department of Human Services</b>  <b>2017 – Present</b>	PCG is managing the integration of Accuity Asset Verification’s financial institution data into the State’s eligibility system. PCG’s AVS solution allows eligibility workers to request data featuring 60 months’ worth of account balances from 100 percent of the nation’s financial institutions in real-time in order to determine the eligibility of Medicaid Aged, Blind, and Disabled (ABD),
Asset Verification Services	<b>Utah Department of Workforce Services</b>  <b>2017 – Present</b>	PCG was selected to manage the implementation our asset data from our financial institution network and our property vendor into PCG’s Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the asset resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries.
Asset Verification Services	<b>New Hampshire Department of Health and Human Services</b>  <b>2016 – Present</b>	PCG is providing subject matter expertise and consulting assistance for the State and Accuity as they implement asset verification services to verify the resource-based eligibility of the State’s Medicaid Aged, Blind and Disabled population.
Asset Verification Services	<b>Iowa Department of Social Services</b>  <b>2017 – Present</b>	PCG is providing subject matter expertise and consulting assistance for the State and Accuity, as they implement asset verification services to verify the resource-based eligibility of the State’s Medicaid Aged, Blind and Disabled population.
Asset Verification Services	<b>Nevada Department of Health and Human Services</b>  <b>2016 – Present</b>	PCG is providing subject matter expertise and consulting assistance for the State and Accuity, as they implement asset verification services to verify the resource-based eligibility of the State’s Medicaid Aged, Blind and Disabled population.

Project	Client	Project Description
Trusted Data Source Provider	<b>Maine Department of Health and Human Services</b>  <i>2017 – Present</i>	PCG managed the design and implementation of an asset and property verification solution, which includes financial institution data from Accuity and property data from LexisNexis. PCG integrated this data into our Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the asset and property resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries.
Asset Verification Services	<b>Wisconsin Department of Health Services</b>	PCG was selected to manage the implementation our asset data from our financial institution network and our property vendor into PCG’s Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the asset resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries.
Asset Verification Services	<b>Utah Department of Workforce Services</b>	PCG was engaged to implement Accuity Asset Verification’s financial institution data into the State’s new integrated eligibility system. The combined solution allows eligibility workers to request data featuring 60 months’ worth of account balances from 100 percent of the nation’s financial institutions in real-time in order to determine the eligibility of Long Term Care applicants and beneficiaries.
Automated Residency Verification System	<b>Wisconsin Department of Health Services</b>  <i>2014 – Present</i>	<p>PCG managed the design and implementation of a Web-based, automated residency verification system. This system integrates LexisNexis identity and residency data sources to identify Medicaid recipients residing outside of the State who are therefore potentially ineligible for benefits. PCG’s web application features simple, yet robust, reporting and case management capabilities and allows for both batch and ad hoc request-and-response processing.</p> <p>PCG uses data to verify the eligibility of more than 10,000 Medicaid consumers per month on this engagement</p>
SSDI and Medicare Eligibility and Enrollment	<b>UAW Retiree Medical Benefits Trust</b>  <i>2011 – Present</i>	PCG established a large-scale operation to support the identification of potentially disabled retirees covered under UAW’s benefits plan who were potentially eligible for Social Security Disability Insurance, and subsequently, early Medicare enrollment. PCG performs manages the member targeting, identification, eligibility determination, outreach, application, and advocacy services, associated with this engagement with the world’s largest self-funded retirement plan.

An important focus for PCG in this engagement is introducing best practices, learned through similar asset and eligibility verification engagements, to provide DHHR with a superior service, backed by critical, proprietary asset data and implemented in support of DHHR’ goals of reducing expenditures, maximizing revenues, and ensuring program integrity. **Simply put, no other vendor has as much national experience assisting clients in establishing the efficient amalgamation of disparate data sets into eligibility determination systems.**

PCG not only understands asset and eligibility verification, we also understand Medicaid and SNAP. PCG is a recognized national leader in benefits eligibility consulting, including large scale project management,

systems integration and IV&V, business process redesign, and policy development and implementation. No other vendor has worked as tirelessly on behalf of 49 Medicaid agencies over 30 years to reduce costs, improve operations, and maximize federal reimbursements.

PCG has successfully supported state health and human services agencies in the planning, evaluation, and integration of **complex member and provider eligibility systems and solutions**, including on the following projects:

- NY DOH Asset and Real Property Resource Verification System
- WA DSHS Provider Compensation System Project
- WI DHS Medicaid Cost Reporting System Project
- MA the State Integrated Eligibility Phase 2 Strategic Plan Project
- CA DHHR MMIS Project Planning & Evaluation Project
- KY HHSC IT Assessment Project
- DE DHSS Integrated Eligibility Project
- CA DHHR DSS Case Management Information Payrolling System
- NV DHHS Healthcare Reform Eligibility Engine
- NYED EngageNY Portal
- MT DPHHS Integrated Eligibility System Project
- HI DHS Integrated Eligibility System Project
- PA DPW PELICAN and HCSIS ITSS Project
- Hawaii Health Connector Hi'i Ola Portal for Navigator Training, Certification, and Tracking Project
- NC DMA Provider Screening and Enrollment Case Management

PCG has a long history of **expert project management** and has successfully implemented and administered dozens of large-scale (>\$10M) projects and operates the Project Management Office on behalf of state health and human services agencies nationwide, including on the following engagements:

- RI the State, Project Management Office for the Integrated Eligibility System/MMIS
- NM Health Insurance Exchange, Project Management Office for the HIX
- HI Connector, Project Management Office for the DD&I and M&O of the Health Connector Project
- TN Division of Health Care Finance and Administration Medicaid Modernization Program Project Management Office
- NC DHHS Medicaid Provider Oversight Project
- NY DOH DSRIP Independent Assessor Project
- PA DPW Information Technology and Support Services Project
- MA DDS Participant Directed Program
- VA DMAS Consumer Directed Fiscal Agent Services Project
- CA San Diego County TANF Welfare-to-Work Employment Project
- HI Health Connector Information Systems Consultant Project
- PA DPW Title IV-E Compliance Project
- MA HICA State Care Customer Services
- NY DOH Early Intervention State Fiscal Agent Project
- DC DHCF ASO Operations Project
- OH HCBS Provider Oversight Project
- NY DOH Asset Verification and Real Property Resource Verification System
- DE HHS Health Care Reform and Health Benefit Exchange Planning Consulting
- WA DSHS Provider Compensation Subsystem and Services Project
- MI DCH Third Party Billing

PCG is also the recognized national leader of eligibility system consulting services for state agencies across North America and has **19 years of experience providing Independent Verification & Validation (IV&V) services** on large-scale, complex eligibility and MMIS deployments. On many of these projects, one-time costs have exceeded \$5 billion and stakeholder involvement has been significant. PCG has extensive experience providing IV&V services alongside all of the major system integrators, such as Accenture, Xerox (formerly ACS), HP (formerly EDS), Deloitte, IBM, CGI, SAIC, CNSI and KPMG. Allowing these systems to share, analyze and report on data across multiple entities efficiently,

effectively, and accurately is a key feature of PCG’s contribution to these statewide integrated eligibility solutions.

PCG is pleased to provide the following list of 24 Health and Human Services projects where we currently perform, or have successfully completed, services and deliverables of similar scope and complexity to that of the State of West Virginia’s asset verification initiative.

	Project	Timeframe
1	AL DHR Integrated Eligibility System Project	3/14 – 6/16
2	DE DHSS Medicaid Management Information System (MMIS) Project	2/14 – 6/15
3	DE DHSS Integrated Eligibility Project	1/14 – 12/16
4	CA Child Welfare System Replacement Project	2/14 – 1/16
5	MT DPHHS Integrated Eligibility System Project	11/13 – 12/15
6	GA DBHDD Mental Health Data Warehouse Project	3/13 – 3/14
7	HI DHS Integrated Eligibility System Project	1/13 – 12/15
8	WA HCA Health Benefit Exchange Project	8/12 – 12/13
9	NV Silver State Health Insurance Exchange Technical Solution	8/12 – 1/14
10	NV DHHS Healthcare Reform Eligibility Engine Project	7/12 – 6/14
11	IA DHS Eligibility System Replacement Project	7/12 – 6/14
12	IA DHS MMIS Replacement Project	3/12 – 5/15
13	LA DHH MMIS Replacement Project	2/12 – 12/14
14	GA DHS Eligibility Project	1/12 – 4/16
15	CO DHS Automated Child Support Enforcement System Project	11/11 – 8/13
16	CA DHHR MMIS Project	7/10 – 4/16
17	CA DHR Case Management Information Payrolling System Project	10/04 – 8/13
18	CA DHR Interim Statewide Automated Welfare System Project	11/06 – 6/10
19	CA DHHR Dental MMIS Replacement Project	5/07 – 1/08
20	MA DHR Benefit Eligibility and Control Online Network Project	3/09 – 3/10
21	CA DHHR HIPAA Short Doyle Project	5/07 – 2/10
22	CA DHHR Provider Enrollment Automation Project	9/07 – 11/09
23	MS HHSC Eligibility Modernization Project	9/13 -- Present
24	CA DSH PDAS Project	4/13 – 3/15

Our approach to each eligibility consulting engagement is pragmatic, participative and practical. Our efforts focus on the early identification of potential risks and the development of mitigation strategies to avert risk in order to support the project’s ability to progress through the entire life cycle. PCG will leverage this same approach, including the lessons learned during these previous engagements, to bring industry best practices in benefits eligibility verification to the State of West Virginia.

Our approach to each eligibility consulting engagement is pragmatic, participative and practical. Our efforts focus on the early identification of potential risks and the development of mitigation strategies to



avert risk in order to support the project's ability to progress through the entire life cycle. PCG will leverage this same approach, including the lessons learned during these previous engagements, to bring industry best practices in benefits eligibility verification to the State of West Virginia.



For the 20<sup>th</sup> time, including on this engagement, PCG has partnered AVS data provider, Accuity, who is the nation's only vendor with independent asset verification services (AVS) agreements with and access to 100 percent of the nation's financial institutions, ensuring that your most costly long term care members are subject to a comprehensive and accurate resource review. Accuity's financial institution access is both unique and critical. No other vendor can deliver this access to the national, regional and local banks. Accuity's distinct advantage and benefit to an agency is their ability to provide current account data across the country based on the automated, Web-based manner in which we request data from local, regional and national financial institutions. With a transient Medicaid population, Accuity can identify undisclosed assets across the country from both large, multinational financial conglomerates and rural mom and pop credit unions alike. The balances provided meet the requirement to provide a look back of up to 60 months consistent with Medicaid eligibility standards and Section 1940 of the Social Security Act, for both open and closed financial accounts.

Accuity is a leading provider of asset verification, global payment routing data, Anti-Money Laundering screening data and software and professional services that allow organizations, across multiple industries, to maximize efficiency and facilitate compliance of their transactions. Accuity maintains authoritative and comprehensive databases globally with a reputation built on the accuracy and quality of our data, products and services. For more than 175 years, Accuity has been providing industry-leading solutions to clients worldwide. Accuity works with over 17,000 customers globally who rely on their predictive financial data, software and consulting solutions. Accuity has twelve years of asset verification services experience. In 2003, Accuity developed a secure electronic communication platform connecting the field offices of the Social Security Administration's (SSA) Supplemental Security Income (SSI) Benefits Program with the financial institution community to facilitate financial asset verification for eligibility determination. This program is known as the Access to Financial Institutions Program (AFI). In the years since, Accuity has been a part of every health and human services agency asset verification services implementation except one.



Because comprehensive and accurate data are critical to the successful deployment of an effective asset verification solution, PCG has also partnered with LexisNexis on this engagement in order to obtain access to the largest commercially available repository of identity records in the world, allowing for the industry's most comprehensive search for properties. The LexisNexis identity and eligibility verification data repository is the largest and fastest-growing such repository in the country, and links together in excess of 44 billion records drawn from over 10,000 disparate sources, accounting for 700 million unique identities. Data sources are refreshed daily, meaning that the information that will be provided is no older than this morning. In addition to the current data store, an average of 30 million raw files are processed daily, continually adding to the breadth of information available to DHHR.

LexisNexis has spent more than 40 years collecting and analyzing data, and 30 years of analyzing and filtering identities as they appear in public and private data sources. This includes over 45 billion batch and real-time transactions annually and an average of 160 million records per day. Some of our key customers who utilize our identity resolution products do so in an effort to service the entire U.S. population, running **over 600 million records per month** through our technology platform. LexisNexis is adept at handling the largest organizations and their identity resolution needs. Taking in millions of records on different frequency (some near real-time) and in widely differing formats and quality, LexisNexis resolves down to unique, accurate identities (LexisNexis LexID) every day.

Every state in the nation uses LexisNexis public records tools in some capacity. This includes thousands of county and city level entities that need better visibility into the identities of the citizens that utilize their

services. Through the identification, retrieval, storage, analysis and delivery of data, LexisNexis serves the informational needs of a variety of industries involving businesses of all sizes, as well as federal, state and local government agencies including:

- Working with all 50 states;
- 70% of local government and almost 80% of federal agencies use LexisNexis;
- 17 of the 20 largest health insurance plans;
- 4 of the 10 largest preferred provider organizations;
- 5 of the top 15 pharmaceutical companies;
- The two largest medical device manufacturers ensuring appropriate access to health care data and programs, enhancing disease management contact ratios, improving operational processes, and proactively combating fraud, waste, and abuse across the care continuum;
- Providing solutions to the Top 50 U.S. banks; and
- LexisNexis is involved in 99% of all U.S. auto insurance claims and 96% of all homeowner's claims.

Additionally, LexisNexis is a designated provider of solutions to AHIP, has a strategic alliance with NHCAA to fight FWA, and is a member of HIMSS G7 thought leadership.

Together with our AVS data providers, Accuity and LexisNexis, PCG offers Medicaid agencies the only proven Asset Verification Service (AVS) in the country, backed by an experienced team of Medicaid eligibility subject matter experts and the nation's most comprehensive network of financial institutions and property information. With our combined experience, no other vendor can match the lessons learned and best practices we can bring to bear on this engagement.

#### **4.1 References**

Public Consulting Group, Inc. (PCG) is a national leader for providing high quality, low maintenance Medicaid asset verification services, See below for a full listing of the relevant projects' scopes, key achievements, and references. Please contact the identified individuals under "References" to learn more about PCG's AVS expertise and overall performance.

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CONNECTION TO  
PROPOSAL

✓ *Asset  
Verification*

**HEALTH AND HUMAN SERVICES COMMISSION  
STATE OF TEXAS  
DATA BROKER SERVICES**

JULY 2016–PRESENT

**SCOPE**

PCG was engaged to integrate nearly 50 federal, state and commercial verification data sources into the nation's most comprehensive benefits eligibility decision support solution accessible through PCG's proprietary eligibility verification data hub. PCG processes real-time eligibility requests through each of our data interfaces to obtain critical identity, income, household composition, asset, residency, property, citizenship, death, and incarceration status information and uses our proprietary rules engine to automate the use of all of this data to predict eligibility and detect fraud.

PCG is processing more than 2 million transactions per day as the State's data broker and is connecting eligibility workers with more data and analytics than is available anywhere else in the United States, including establishing interfaces with: LexisNexis Identity Authentication and Verification; Equifax The Work Number; Experian Credit and Fraud Shield; Accuity Asset Verification; SSA; IRS; DHS SAVE; TX DMV; FNS eDRS; OCSE; NDNH; TX Workforce Commission; PARIS; public employee retirement systems; TX Lottery Commission, and dozens more.

**REFERENCES**

David L. Lumpkins  
Texas Health and Human Services Commission  
Access and Eligibility Services  
Data Broker Product Owner  
Office: (512) 310-4678  
Cell: (512) 466-8637

CONNECTION TO  
PROPOSAL

✓ *Asset  
Verification*

**OKLAHOMA HEALTH CARE AUTHORITY,  
STATE OF OKLAHOMA**

**ASSET VERIFICATION SYSTEM**

JULY 2015 – PRESENT

**SCOPE**

PCG designed and deployed a Web-based, automated asset verification system to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD) applicants and beneficiaries. This configurable, automated eligibility decision support and case management system integrates data from Accuity's national network of financial institutions into the PCG-developed Web application to allow eligibility workers to quickly and seamlessly obtain asset verification results, identify potentially ineligible recipients and applicants, flag fraud, and generate custom reports. PCG's Asset Verification System allows the State to reconcile eligibility decisions made within their integrated eligibility solution with the eligibility results of cases contained within the application, ensuring Portal data is up-to-date and accurate at all times.

**REFERENCES**

Matt Conley  
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Matthew.Conley@okdhs.org

CONNECTION TO  
PROPOSAL

✓ *Asset  
Verification*

**DEPARTMENT OF HEALTH AND HUMAN SERVICES,  
DIVISION OF MEDICAL ASSISTANCE,  
STATE OF NORTH CAROLINA**  
ASSET VERIFICATION SERVICES  
JANUARY 2013– PRESENT

**SCOPE**

PCG managed the integration of Accuity's financial institution data into the State's new integrated eligibility system (NCFAST). The combined solution allows eligibility workers to request data featuring 60 months' worth of account balances from 100 percent of the nation's financial institutions in real-time in order to determine the eligibility of Aged, Blind, and Disabled applicants and beneficiaries.

**KEY ACHIEVEMENTS**

PCG's AVS allowed North Carolina's Division of Medical Assistance (DMA) to automate and replace the collection and review of 60 months' worth of bank statements for more than 240,000 applications and re-certifications for Aged, Blind and Disabled services during the first 12 months of the program. It is estimated that if collecting and processing 60 months' worth of account statements previously took DMA's eligibility staff an hour of time, PCG's AVS Portal gained DMA the equivalent of 1 years' worth of work from 108 eligibility worker FTEs in 12 months.

**REFERENCES**

Betty J. Dumas-Beasley  
N.C. Department of Health and Human Services  
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CONNECTION TO  
PROPOSAL

✓ *Asset  
Verification*

**EXECUTIVE OFFICE OF HEALTH AND HUMAN SERVICES,  
COMMONWEALTH OF MASSACHUSETTS**

**ASSET VERIFICATION PROJECT**

MARCH 2016 - PRESENT

**SCOPE**

Section 1940 of the Social Security Act and CMS Memorandum 011309 require state Medicaid agencies to implement automated electronic asset verification systems to verify the resource-based eligibility of Aged, Blind and Disabled (ABD) populations.

PCG designed and deployed a web-based, automated asset verification system to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD) applicants and beneficiaries. This configurable, automated eligibility decision support and case management system integrates data from Accuity's national network of financial institutions into the PCG-developed Web application to allow eligibility workers to quickly and seamlessly obtain asset verification results, identify potentially ineligible recipients and applicants, flag fraud, and generate custom reports. PCG's Asset Verification System allows the State to reconcile eligibility decisions made within their integrated eligibility solution with the eligibility results of cases contained within the application, ensuring Portal data is up-to-date and accurate at all times.

**REFERENCES**

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CONNECTION TO RFP

✓ *Asset  
Verification*

**EXECUTIVE OFFICE OF HEALTH AND HUMAN SERVICES,  
DISTRICT OF COLUMBIA**

**ASSET VERIFICATION SERVICES**

MARCH 2016 – PRESENT

**SCOPE**

PCG implemented our Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries by accessing financial institution data.

**REFERENCES**

Gary M. Watts  
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## 4.2 Staffing

It is important for the state of West Virginia to understand that Public Consulting Group, Inc. (PCG) features, by a wide margin, the most experienced AVS project team in the United States. PCG's proposed AVS project manager has been nationally recognized as a leading AVS subject matter expert and has managed similar implementations in a dozen states while spending the past 5 years working exclusively with 20 different Medicaid agencies on asset and eligibility verification systems and solutions. No other vendor team can leverage the best practices and lessons learned accrued from more than a dozen AVS implementations to ensure such a precise and meticulous AVS implementation in the state of West Virginia.

The PCG team is made up of a select group of subject matter experts with deep experience in planning, designing, implementing, and managing projects similar to the services provided here. The PCG team includes staff with experience both managing and supporting eligibility verification projects and thought leaders in eligibility verification solutions and systems.

PCG's proposed project team has more Medicaid AVS experience than that of all other Vendor staff combined, as evidenced by our comparable AVS engagements around the United States:

Project	Asset Verification	Additional Eligibility Verification
Colorado Department of Healthcare Finance & Policy	✓	
Delaware Division of Medicaid and Medical Assistance	✓	✓
District of Columbia Department of Human Services	✓	
Iowa Department of Social Services	✓	
Maine Department of Health and Human Services	✓	✓
Maryland Department of Human Resources	✓	✓
Massachusetts Executive Office of Health and Human Services	✓	
Montana Department of Public Health and Human Services	✓	
Nevada Department of Health and Human Services	✓	
New Hampshire Department of Health and Human Services	✓	✓
New Jersey Department of Human Services	✓	
New York City Human Resources Administration/Department of Social Services (HRA/DHR)	✓	✓
New York Department of Health	✓	✓
North Carolina Division of Medical Assistance	✓	
South Dakota Department of Social Services	✓	
Oklahoma Health Care Authority	✓	
Texas Health and Human Services Commission	✓	✓
Wisconsin Department of Health Services		✓

No other vendor can offer the depth and breadth of AVS experience that PCG brings to this engagement.

A snap shot of the PCG Asset Verification team's applicable experience is as follows:



Resource Name	Project Role	NY AVS	TX AVS	CO AVS	NC AVS	OK AVS	MD AVS	NJ AVS	MA AVS	DC AVS	SD AVS	ME AVS	DE AVS	MT AVS	NYC AVS	NH AVS	NV AVS	IA AVS
Thomas Aldridge, MHA	Engagement Director	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Peter Cheesman, MBA	Project Manager	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Kalen Summers, MA	Associate Project Manager	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Brenda Baldwin, MSA	Operations Manager	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Kate Powers	Implementation Manager	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Jason Balaban	Data Manager	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Shawn Kotoske	PMO Lead		✓	✓		✓	✓			✓	✓	✓	✓	✓				
Rich Albertoni, MPA	Medicaid Eligibility SME		✓	✓		✓	✓			✓	✓	✓	✓	✓				
Conor Glasheen	Business Analyst		✓	✓		✓	✓			✓	✓	✓	✓	✓	✓			
Chris Bacho	Business Analyst		✓	✓		✓	✓			✓	✓	✓	✓	✓	✓			
Adam Knowlton	Software Engineering Manager	✓	✓	✓		✓	✓		✓	✓	✓	✓	✓	✓	✓			
Dave Falco, MBA, PMP	Delivery Manager	✓	✓	✓		✓	✓		✓	✓	✓	✓	✓	✓	✓			
Dan Cahalan	Delivery Lead	✓	✓	✓		✓	✓		✓	✓	✓	✓	✓	✓	✓			
Matt Cofran	Systems	✓	✓	✓		✓	✓		✓	✓	✓	✓	✓	✓	✓			

	Technical Lead																	
Ronak Khatri	QA Technical Lead		✓	✓		✓	✓			✓	✓	✓	✓	✓				
Joshna Bachuwar	Engineering Team Lead	✓	✓	✓		✓	✓		✓	✓	✓	✓	✓	✓	✓			
Chaithanya Thathineni	Accuity Service Manager	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Srinivasa Pothukuchi	Accuity Testing Lead	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

PCG’s key project team personnel will work with the State of West Virginia, our AVS data subcontractor, financial institutions, and project stakeholders to manage project deliverables, including the integration and ongoing operations of the AVS in accordance with contract requirements and DHHR expectations.

The table that follows describes key project team members’ roles and responsibilities.

Resource Name	Project Role	Role Description
Thomas Aldridge, MHA	Engagement Director	Mr. Aldridge will be ultimately responsible for overall contract compliance, working with the Project Manager in risk identification, mitigation, and resolution activities. He will be heavily involved in the development and implementation phases, and will be the point of contact for escalations and crisis management during the operations phase.
Peter Cheesman, MBA	Project Manager	<p>Mr. Cheesman will provide development and operations oversight and direction to the project team during all phases of this engagement. He will have the authority to represent PCG in all discussion regarding matters pertaining to this agreement and to make day-to-day operational decisions related to the services provided under this agreement.</p> <p>Mr. Cheesman will monitor benchmarks, compliance with service level agreements, deliverables, throughput, and other key operational indicators to ensure the ultimate successful transition of the Asset Verification Service.</p>
Kalen Summers, MA	Associate Project Manager	Mr. Summers will support all project management activities, including implementation, operations, monitoring and compliance, and deliverables.
Rich Albertoni, MPA	Medicaid Eligibility SME	Mr. Albertoni will provide guidance and best-practice knowledge regarding eligibility policy and the appropriate use of asset verification data in determining Medicaid eligibility throughout this engagement.
Brenda Baldwin, MSA	Operations Manager	Ms. Baldwin will oversee call center and user support activities, testing and bug resolution, system maintenance and operations, and production deliverables and other project throughput.
Steve Myers	Implementation Manager	Mr. Myers will coordinate implementation documentation, benchmarks, and milestones, including scheduling meetings, overseeing the completion of implementation tasks and deliverables, defining training requirements, executing in-person and remote training, creating training materials, documenting frequently asked questions, and implementing improvements to the training curriculum based on user feedback.
Jason	Data Lead	Mr. Balaban will provide expertise and guidance on best practices for

Resource Name	Project Role	Role Description
Balaban (Accuity)		integrating and utilizing asset verification services data and will oversee the PCG Team’s network of financial institutions.
Shawn Kotoske	PMO Lead	Mr. Kotoske will ensure PCG’s asset verification service is planned, documented, and implemented according to PCG’s PMI-based approach to project management.
Chris Bacho	Business Analyst	Mr. Bacho will assist project management staff in fulfilling reporting, training, and operations activities throughout this engagement.
Conor Glasheen	Business Analyst	Mr. Glasheen will assist project management staff in fulfilling reporting, training, and operations activities throughout this engagement.
David Falco, MBA, PMP	Delivery Director	Mr. Falco will provide technical, analytical, and data integration expertise and management for the design and maintenance of PCG’s Asset Verification Services solutions.
Adam Knowlton	Software Engineering Manager	Mr. Knowlton will supervise the development of eligibility databases and the Asset Verification Services integration, including requirements and rules definition, eligibility programming logic, and system quality assurance.
Brett Tervalon	Delivery Manager	Mr. Tervalon will oversee the technical implementation of PCG’s asset verification services, working with project stakeholders to define technical requirements and ensure a meticulous implementation.
Matt Cofran	Systems Technical Lead	Mr. Cofran will create and maintain hardware and software systems for all aspects of PCG’s Asset Verification Service and the accompanying Web application. He will also ensure that all connectivity, security, and SLA requirements are fully supported.

On the following pages, please find the resumes for key Public Consulting Group, Inc. (PCG) staff members assigned to this project.

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**Engagement Director: Thomas Aldridge, MHA  
Manager  
Public Consulting Group, Inc.**

Thomas Aldridge has 15 years of experience with PCG and 17 years in the healthcare financial services arena. Mr. Aldridge is the engagement manager for the recently awarded New York Asset Verification System project, which includes both asset and real property verifications. He is currently leading PCG's Payer Solution Services portion of our Health practice area leading efforts to control costs for payers through placement of tighter controls on eligibility and medical/pharmacy claims. Through his leadership, PCG offers to its public and private payer clients solutions such as: (1) Fraud and Abuse Detection, Validation and Recovery, (2) Dependent Eligibility Audits, (3) Specialty Pharmacy Network Management, (4) Pharmacy Rebate Optimization, (5) SSDI/Medicare Disability Determination and Enrollment Services, (6) High Cost Member Care Management Services and (7) Member and Provider Support Services. In addition, Mr. Aldridge has led revenue maximization project teams in North Carolina, West Virginia, and Louisiana, as well as our Medicare Part D State-to-Plan claims reconciliation project with CMS. Through these efforts Mr. Aldridge gained valuable experience including projects with Medicaid, Mental Health, Public Health, and Child Welfare agencies encompassing the areas of accounts receivable, accounts payable, MMIS, billing/documentation compliance, DSH, family planning, Upper Payment Limits (UPL) and mental health facilities in addition to numerous other revenue enhancement initiatives. Before joining PCG,

Mr. Aldridge served as a physician practice services manager for a large physician management company in Macon, Georgia. Mr. Aldridge received his Bachelor of Arts in Economics from Clemson University and completed a Master's Degree in Healthcare Administration (MHA) at the University of North Carolina at Chapel Hill.

**RELEVANT PROJECT EXPERIENCE**

**Division of Medical Assistance, State of North Carolina**

Serves as Project Director of several key initiatives aimed at controlling costs of care for Medicaid providers including: (1) Prepay and post-pay provider audits, (2) Onsite Provider Screenings, (3) Potential Overpayment Investigations and (4) Provider Education and Training. Through this initiative, PCG has educated more than 1,500 providers, completed more than 2,000 onsite screens preventing 100+ non-compliant providers from entering the Medicaid network and identified and validated more than \$300M in overpayments.

**Department of Medicaid, State of Ohio**

Serving as Project Director of PCG's Provider Oversight and Monitoring project responsible for ensuring health and safety of beneficiaries of HCBS services. Project scope includes: (1) Incident Investigations, (2) Structural Reviews, (3) Onsite Reviews and (4) Provider Enrollment Services. Through this project, the team investigates more than 1,200 incidents per month, performs more than 200 onsite and structural reviews and processes hundreds of applications for Medicaid provider enrollment.

**United Auto Workers (UAW) Retiree Benefits Trust, SSDI Enrollment Services, USA**

Serving as the Project Director for PCG's engagement with UAW to identify and enroll beneficiaries into SSDI and ultimately qualify them for Medicare. To date, PCG has helped enrolled more than 2,000 disabled beneficiaries into SSDI generating \$30M+ in direct payments to the beneficiaries and \$50M+ in estimated costs savings for the health plan.

**Medicare Part D Claims Reconciliation, Federal CMS**

Responsible for establishing, testing and executing claims submission processes between State Medicaid agencies and State Pharmacy Assistance Programs (SPAPs) and the contracted PBMs of the liable Part D plans. Through this project, PCG successfully, electronically reconciled over 5M claims valued at more than \$600M between PBMs and State Medicaid agencies.

**Health, Mental Health and SA Services, Mecklenburg County, State of North Carolina**

Implemented revenue enhancement strategies by automating processes and improving performance of

the accounts receivable unit. PCG managed receivables of more than \$40M annually, increased revenue for by more than \$10M over the previous fiscal year baseline and increased billing compliance accuracy throughout the network to greater than 90%.

**Department of Health and Human Resources, State of West Virginia**

Lead revenue maximization engagement for West Virginia for the duration of the 8 year engagement. Projects included work with MHDDSA facilities, Medicare Drug Billing, retroactive Medicaid claiming, school-based Medicaid claiming, nursing homes, Medicare cost reports, DSH, Upper Payment Limits, Family Planning, Medicare Support Enforcement, Claims Review, Medicaid Rate Setting, Accounts Receivable improvement and other revenue initiatives. Through these projects, PCG assisted the State recover more than \$100 million.

**Medicaid Third Party Identification, Multiple Medicaid and MCOs**

Managed projects to identify and verify insurance for Medicaid members providing both recovery and cost savings opportunities for Medicaid agencies. Prior experience includes work with the State of Louisiana, Americhoice, Amerihealth Mercy and North Carolina to name a few.

**Medicaid Asset Verification Services, Multiple Medicaid Agencies**

Managed successful Asset Verification projects in New Hampshire, North Carolina and most recently New York and Oklahoma. Through these projects, PCG manages the design and deployment of an electronic identity and asset verification solution used to verify the identity and resources of Aged, Blind and Disabled and MAGI applicants and beneficiaries. To date, PCG has verified assets for tens of thousands of Medicaid members and identified assets that exceed the limit set forth by the respective Medicaid programs.

**Molina Health Subcontractor, State of Maine**

Established Medicaid Member Services project for State of Maine. Project includes call center, enrollment broker and outreach and informing activities for Medicaid members in Maine. Scope of work includes implementation of efficient business process and automated applications for optimal outcomes to manage 12,000 calls per month related to eligibility and enrollment.

**Dell Services Subcontractor, State of Massachusetts**

Led nation's first Health Insurance Exchange project for MA Connector. Project includes call center, enrollment broker and outreach and information activities for Massachusetts uninsured, CHIP and Medicaid populations. Project involves deployment of business processes for efficient operations to manage anywhere from 30 to 75 agents depending on workload.

**PROFESSIONAL BACKGROUND**

**Public Consulting Group** 1997 – Present

**Central Management Services** 1996 – 1997

**EDUCATION**

**University of North Carolina at Chapel Hill, Chapel Hill, NC**  
 Master of Health Care Administration (MHA), Financial Management Services

**Clemson University, Clemson, SC**  
 Bachelors of Arts, Economics

**Project Manager: Peter H. Cheesman, MBA**Associate Manager  
Public Consulting Group, Inc.

Mr. Cheesman leads PCG Health's member eligibility systems and services group. In this capacity, Mr. Cheesman has overseen the implementation and operation of identity and eligibility verification systems and data broker solutions for health and human services agencies in Texas, New York, North Carolina, Colorado, New Jersey, Maine, Massachusetts, Maryland, Wisconsin, Nevada, Delaware, West Virginia, Oklahoma, South Dakota, District of Columbia, Montana, Utah, and New Hampshire, and on behalf of the UAW Retiree Medical Benefits Trust, Caterpillar Corporation, and Whirlpool, Inc. Mr. Cheesman has more than a decade of public sector consulting experience, including working on behalf of more than 50 federal, state, and commercial organizations to identify more than \$1 billion in revenue generation and cost savings opportunities. Mr. Cheesman specializes in designing and deploying creative technical solutions which allow agencies to use federal, state, and commercial data sources and predictive analytics to better identify fraud and ineligibility while automating and expediting case processing activities. As a leading national subject matter expert in this area, Peter regularly assists government agencies and commercial vendors in defining and deploying critical data solutions used to reduce public assistance program expenditures. Mr. Cheesman received his B.S. in Business Administration from Northeastern University and his M.B.A. from Clark University.

**RELEVANT PROJECT EXPERIENCE****Health and Human Services Commission, State of Texas**Data Broker Services*Project Owner*

Mr. Cheesman managed the design and implementation of a data broker service linking the State's benefits eligibility system to nearly 50 different federal, state, and commercial data sources and applying more than 500 predictive analytics data matches in order to expedite worker identity and eligibility verification procedures and enhance HHSC's ability to identify fraud and/or ineligibility across all public assistance programs.

**Department of Health, State of New York**Asset Verification and Real Property Resource Verification System*Project Manager*

Mr. Cheesman managed the design and implementation of an eligibility verification solution linking Medicaid applicants and recipients with the financial and property resources they own. Mr. Cheesman linked our Web application to asset data and real property data and featured predictive risk scoring, disqualifying asset transfer flagging, decision support solutions, a self-service reporting dashboard, and configuration options to allow future scalability and web services connectivity to the State's forthcoming IES.

**Health Care Authority, State of Oklahoma**Asset Verification Services*Project Manager*

Mr. Cheesman designed and deployed a Web-based, automated asset verification system to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD) applicants and beneficiaries. This configurable, automated eligibility decision support and case management system integrates data from financial institutions into the PCG-developed AVS Web Portal to allow eligibility workers to quickly and seamlessly obtain asset verification results, identify potentially ineligible recipients and applicants, flag fraud, and generate custom reports. PCG's AVS Web Portal allows the State to reconcile eligibility decisions made within their integrated eligibility solution with the eligibility results of cases contained within the application, ensuring Portal data is up-to-date and accurate at all times.

**Department of Health Services, State of Wisconsin**Electronic Asset Verification*Project Manager*

Mr. Cheesman is managing the implementation of PCG's electronic asset verification data service into the State's benefits eligibility system in order to inform workers about bank accounts and other assets maintained by Medicaid Long Term Care applicants.

**Division of Workforce Services, State of Utah**Asset and Property Verification Services*Project Manager*

Mr. Cheesman is managing the integration of financial institution and real property data into PCG's AVS Web Portal. This combined solution will allow the agency to access critical asset data used to verify the eligibility of Medicaid applicants.

**Division of Medical Assistance, State of North Carolina**Asset Verification Services*Project Manager*

Mr. Cheesman managed the integration of financial institution data into the State's new integrated eligibility system (NCFAST). The combined solution allows eligibility workers to request data featuring 60 months' worth of account balances from 100 percent of the nation's financial institutions in real-time in order to determine the eligibility of Aged, Blind, and Disabled applicants and beneficiaries.

**Executive Office of Health and Human Services, State of Massachusetts**Asset Verification Services*Project Manager*

Mr. Cheesman led the implementation of PCG's Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD), Long Term Care, Community, Buy-In, and Waiver applicants and beneficiaries. This configurable, automated eligibility decision support and case management system integrates data from financial institutions into the PCG-developed AVS Web Portal to allow eligibility workers to quickly and seamlessly obtain asset verification results, identify potentially ineligible recipients and applicants, flag fraud, and generate custom reports.

**New York City Human Resources Administration/Department of Social Services (HRA/DHR)**Asset Verification and Real Property Resource Verification System*Project Manager*

Mr. Cheesman managed the design and implementation of an eligibility verification solution linking Medicaid applicants and recipients with the financial and property resources they own. Mr. Cheesman linked our Web application to asset data and real property data and featured predictive risk scoring, disqualifying asset transfer flagging, decision support solutions, a self-service reporting dashboard, and configuration options.

**Department of Human Services, State of New Jersey**Asset Verification Services*Project Manager*

Mr. Cheesman managed the integration of financial institution data into the State's eligibility system. PCG's AVS solution allows eligibility workers to request data featuring 60 months' worth of account balances from 100 percent of the nation's financial institutions in real-time in order to determine the eligibility of Medicaid Aged, Blind, and Disabled (ABD), Long Term Care, Community, Buy-In, and Waiver applicants and beneficiaries.



**Department of Social Services, State of South Dakota**Asset Verification Services*Project Manager*

Mr. Cheesman leads the implementation of PCG's Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care, applicants and beneficiaries. This configurable, automated eligibility decision support and case management system integrates data from financial institutions into the PCG-developed AVS Web Portal to allow eligibility workers to quickly and seamlessly obtain asset verification results, identify potentially ineligible recipients and applicants, flag fraud, and generate custom reports.

**Department of Health and Human Services, State of New Hampshire**Enrollment Data Analysis Services*Project Manager*

Mr. Cheesman managed the design and implementation of Web applications integrating various asset, property, and identity data sources to authenticate and verify applicant/beneficiary identity, ensure assets and property ownership were below program limits, and verify current residency within the State.

**Department of Human Services, District of Columbia**Asset Verification Services*Project Manager*

Mr. Cheesman led the implementation of PCG's Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care, applicants and beneficiaries. This configurable, automated eligibility decision support and case management system integrates data from financial institutions into the PCG-developed AVS Web Portal to allow eligibility workers to quickly and seamlessly obtain asset verification results, identify potentially ineligible recipients and applicants, flag fraud, and generate custom reports.

**Department of Health and Human Services, State of Maine**Asset and Property Verification Services*Project Manager*

Mr. Cheesman led the implementation of PCG's Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the asset and property resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries.

**Department of Public Health and Human Services, State of Montana**Asset Verification Services*Project Manager*

Mr. Cheesman is managing the implementation our Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the asset resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries.

**Department of Human Resources, State of Maryland**Asset Verification Services*Project Manager*

Mr. Cheesman is managing the implementation of our Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the asset and property resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care applicants and beneficiaries.

**Division of Medicaid and Medical Assistance, State of Delaware**Asset Verification Services

***Project Manager***

Mr. Cheesman is managing implementation of PCG's Web-based, automated AVS Web Portal to allow eligibility workers to quickly verify the resources of Medicaid Aged, Blind, and Disabled (ABD) and Long Term Care, applicants and beneficiaries.

**Department of Health Care Policy & Financing, State of Colorado****Asset Verification Services*****Project Manager***

Mr. Cheesman is managing the integration of financial institution data into the Colorado Benefits Management System. The combined solution allows eligibility workers to request data featuring 60 months' worth of account balances from 100 percent of the nation's financial institutions in real-time in order to determine the eligibility of Aged, Blind, and Disabled applicants and beneficiaries.

**Department of Social Services, State of Iowa****Asset Verification Services*****Subject Matter Expert***

Mr. Cheesman is providing subject matter expertise and consulting assistance for the State and Accuity as they implement asset verification services to verify the resource-based eligibility of the State's Medicaid Aged, Blind and Disabled population.

**Department of Health and Human Services, State of New Hampshire****Asset Verification Services*****Subject Matter Expert***

Mr. Cheesman is providing subject matter expertise and consulting assistance for the State and Accuity as they implement asset verification services to verify the resource-based eligibility of the State's Medicaid Aged, Blind and Disabled population.

**Department of Health and Human Services, State of Nevada****Asset Verification Services*****Subject Matter Expert***

Mr. Cheesman is providing subject matter expertise and consulting assistance for the State and Accuity as they implement asset verification services to verify the resource-based eligibility of the State's Medicaid Aged, Blind and Disabled population.

**UAW Retiree Medical Benefits Trust****SSDI and Medicare Eligibility and Enrollment*****Project Manager***

Mr. Cheesman oversees the identification of potentially disabled retirees covered under UAW's benefits plan who were potentially eligible for Social Security Disability Insurance, and later, early Medicare enrollment. Mr. Cheesman manages the member targeting, identification, eligibility determination, outreach, application, and advocacy services, including a project staff of 30+.

**Department of Health Services, State of Wisconsin****Automated Residency Verification for Medicaid*****Project Manager***

Mr. Cheesman managed the design and implementation of a Web-based, automated residency verification system. This system integrated identity and residency data sources to identify Medicaid recipients residing outside of the State. PCG's web application featured simple, yet robust, reporting and case management capabilities and allowed for both batch and ad hoc request-and-response processing.

**Health Care Authority, State of Oklahoma****Trauma Fund Audit**

*Project Manager*

Mr. Cheesman has managed annual statewide provider audits of the financial accuracy and medical necessity of uncompensated care payments made to hospitals, physicians, and EMS providers around the State every year since 2011.

**Division of Medical Assistance, State of North Carolina**Post-Payment Review Services*Project Manager*

Managed post-payment reviews of claim payments to 1,500+ Medicaid providers, identifying \$325+ million in overpayments. Managed project staff of 65 consultants, clinical auditors, appeal specialists, and administrative staff.

**Whirlpool Corporation**Disability Benefits Management*Project Manager*

Mr. Cheesman manages this benefits management project to identify disabled non-Medicare, early retirees covered under the employer-sponsored health plan. Mr. Cheesman supported data analytics, Social Security Disability Insurance application and advocacy, and Medicare enrollment services.

**Caterpillar, Inc.**Disability Benefits Management*Project Manager*

Mr. Cheesman managed this benefits assistance project to identify disabled non-Medicare, early retirees covered under employer-sponsored health plan. Provided data analytics, SSDI application and advocacy, and Medicare enrollment services.

**Human Services Department, State of New Mexico**Post-Payment Review Services*Audit Lead*

Mr. Cheesman led a program integrity review of managed care organization payments to behavioral health providers, including a review of medical necessity, billing, and IT systems.

**Department of Employee Trust Funds, State of Wisconsin**Dependent Eligibility Audit*Project Manager*

Managed project to identify ineligible member dependents and recommend ongoing benefits enrollment procedural and operational improvements.

**Public Employees Insurance Agency, State of West Virginia**Dependent Eligibility Audit*Operations Manager*

Managed operations for dependent eligibility audit of 75,000 public employees across 800 state agencies, including the identification of ineligible employees and dependents, assessment of PEIA's enrollment/eligibility policies and procedures, and process improvement recommendations.

**Department of Finance, Clark County, NV**Dependent Eligibility Audit*Project Manager*

Managed audit of the eligibility of member dependents enrolled in the County's self-funded benefits plans. Identified 600 ineligible member dependents, resulting in an annual cost savings to the County of more than \$1 million.

**Human Resources Benefits Division, City of Charlotte, NC**

Dependent Eligibility Audit

*Project Manager*

Managed audit to determine the eligibility of 15,000 Charlotte member dependents from nine (9) municipal divisions, identifying more than 2,000 ineligible dependents resulting in an annual cost savings to the city of more than \$7 million.

**Department of Health and Human Services, State of North Carolina**

Review of Regulatory Activities

Performed a review of regulatory oversight activities across all Department divisions and identified opportunities for consolidating and streamlining these activities.

**Executive Office of Administration and Finance, State of Massachusetts**

Overpayment Assessment

Identified opportunities for EOHHS & EOE Departments to recoup payments, increase federal revenues and achieve cost savings. Provided research, analysis and reporting on Department of Mental Health and Department of Public Health national best practices.

**Meritor Corporation**

Disability Benefits Management

Supported identification of disabled non-Medicare, early retirees covered under employer-sponsored health plan. Provided data analytics, SSDI application and advocacy, and Medicare enrollment services.

**Hebrew SeniorLife**

Dependent Eligibility Audit

Managed on-site dependent eligibility audit operations and project components, including call center operations, document collection and review, staffing, training, quality assurance, reporting, and client requests.

**Maryland Council Iron Workers**

Dependent Eligibility Audit

Supervised eligibility review of member dependents enrolled in the Council's benefits plans.

**EDUCATION**

**Clark University Graduate School of Management**

M.B.A.

**Northeastern University**

B.S. Business Administration

**Medicaid Eligibility SME: Richard Albertoni, MPA**  
Manager  
Public Consulting Group, Inc.

For over a decade, Rich Albertoni has been involved in the design, development, and implementation of Medicaid delivery systems, programs, and waivers for state Medicaid agencies. From 2003 to 2011, Mr. Albertoni worked in various departments of the Division of Health Care Access and Accountability in the State of Wisconsin. This wealth of experience – working in agencies like the Bureau of Fiscal Management and Bureau of Enrollment Policy and Systems – will be instrumental as Mr. Albertoni leads the work team in the design, development, analysis, evaluation, and implementation of various initiatives.

Mr. Albertoni's knowledge and experience of waivers comes from nearly ten years of work as the State Project Manager for the Wisconsin Health Care Access Expansion Project. His work encompassed a Hospital Assessment that fed into the state's Medicaid expansion waiver to childless adults; Medicaid Childless Adults Waiver for the state's 1115 waiver to expand Medicaid eligibility to low-income childless adults; SeniorCare Waiver Renewal for the renewal of the SeniorCare pharmacy-only benefit waiver and; Adult Basic Health Plan for childless adults who remained on the waiver waitlist.

In his time at PCG, Mr. Albertoni has served as the Project Lead in many Medicaid projects – from the New Hampshire Insurance Project where PCG provided compliance and rate review procedures for QHP certification, to the Managed Care Compliance Consulting project in Texas where Mr. Albertoni provided overall leadership and direction in reviewing current Medicaid managed care compliance practices, to the Qualified Health Plan Project in Arkansas where Mr. Albertoni led the effort in design, development, and implementation.

#### RELEVANT PROJECT EXPERIENCE

**Health Insurance Marketplace and Arkansas Works Consultant, State of Arkansas**

Professional Services Contractor (April 2014 – Present): Healthcare Innovation Consultant

*Project:* Helped Arkansas design, develop and plan implementation for an employer benefit intended to strengthen low-income coverage in the employer-sponsored insurance market. Facilitated program integration among the Marketplace, Medicaid and the Insurance Department to successfully utilize Qualified Health Plans (QHPs) as the Medicaid delivery system. Assist the Health Insurance Marketplace with the design, development, and implementation of a process to certify the qualified health plans that will be participating in Arkansas' exchange. Support Arkansas at federal gate and design review meetings, as well as with completion of the plan management section of Exchange Blueprint.

*Mr. Albertoni:* Worked as PCG's lead consultant to the Arkansas Marketplace Board and Insurance to design, develop, and implement the delivery system for the Medicaid Private Option and Arkansas Works Employer Sponsored Insurance (ESI) initiative. Also served as consulting lead for the successful launch of the Small Business Health Options Program (SHOP) portal, which was delivered on time and on budget.

**Washington Office of Financial Management**

Assessment and Reform of State Mental Health System (May 2016 – Present): Delivery System Consultant

*Project:* Assess the current mental health system infrastructure and programming in Washington State, making recommendations for reform of community programs and hospital care.

*Mr. Albertoni:* Led a team of consultants who recommended future roles for the two state psychiatric hospitals with regard to civil and forensic care. The project also considered steps to integrate behavioral health into commercial managed care and establishment of new mobile crisis units and step up/step down transitional care facilities.

**Mississippi Division of Medicaid, State of Mississippi**

Mississippi Delivery System Consulting (November 2015 – Present): Delivery System Consultant

*Project:* Provide Medicaid delivery system consulting to the Mississippi Division of Medicaid.

*Mr. Albertoni:* Supervise tasks completed by the consulting team, including an organizational analysis, development of policies and procedures, review of supplemental payment models, development of a quality strategy and assistance with state plan amendments and policy briefing papers.

**Tennessee Health Care Finance Administration, State of Tennessee**

TennCare Eligibility Services Project Management (September 2015 – Present): IT Systems Consultant

*Project:* Provide Project Management for two eligibility system upgrades, which included the CoverKids Eligibility System Redesign and TennCare Eligibility Redeterminations.

*Mr. Albertoni:* Provided Medicaid eligibility policy consulting to assist the project team in establishing business requirements. Supervise the work of project management staff and assured that the projects were launched on schedule in December 2015.

**New Hampshire Insurance Department, State of New Hampshire**

New Hampshire Insurance Project (March 2013 – Present): Medicaid Expansion Consultant

*Project:* Provide Plan Management consulting services for New Hampshire's Federal Partnership Exchange.

*Mr. Albertoni:* Supervise entirety of project. Provide technical support of compliance examination and market analysis functions for Qualified Health Plan (QHP) certification. Work with staff from Compliance, Market Conduct, Rate Review and Legal to develop internal operational procedures and checklists for QHP certification process.

**Department of Health and Human Services, State of Delaware**

Health Benefit Exchange Planning (April 2012 – Present): Lead Project Manager

*Project:* Assist the State of Delaware with all planning activities for the establishment of a federal partnership health benefits exchange.

*Mr. Albertoni:* Supervise the work of staff leading efforts to organize plan management and consumer assistance functions, managing the development of the Level 1 establishment grant and the Implementation Advanced Planning Document (IAPD). Provide policy and operational consulting to both the Health and Insurance Departments. Analyze current benefit offerings and state mandates in comparison to the expected essential health benefits package. Identify options for establishing plan and navigator certification criteria. Identify critical timelines for Exchange policy and operational planning.

**Kentucky Cabinet for Health and Family Services, State of Kentucky**

Managed Care Compliance Consulting (July 2012 – June 2013): Project Lead

*Project:* Review current Medicaid managed care compliance practices performed by the Cabinet and comparison of those to national best practices.

*Mr. Albertoni:* Provide overall leadership and direction. Review Medicaid agency staffing and organizational structure to assure consistency with managed care compliance goals and duties. Provide implementation consulting to the Cabinet to support action items identified during the compliance review.

**Nevada Silver State Exchange, State of Nevada**

Health Benefit Exchange Policy Consulting (November 2012 – Present): Project Lead

*Project:* Developed issue briefs providing background and options related to Exchange policy considerations.

*Mr. Albertoni:* Provide analysis of new federal regulations to assess their impact on the Exchange and prepare comments for the State. Draft model notices and other Exchange reference documents.

**Hawaii Health Insurance Connector, State of Hawaii**Health Benefit Exchange Planning (December 2012 – Present): Business Lead*Project:* Provide business analysis related to implementation of Plan Management functions.*Mr. Albertoni:* Assist Hawaii with development of processes necessary to complete certification of qualified health plans. Assure system requirements related to Plan Management are consistent with Affordable Care Act provisions.**Minnesota Department of Human Services, State of Minnesota**Managed Care Evaluation (December 2012 – Present): Project Lead*Project:* Evaluate the value of managed care services for Minnesota public health programs.*Mr. Albertoni:* Served as Project Lead responsible for overseeing all project processes.**University Medical Center of Southern Nevada, State of Nevada**Hospital Waiver and Policy Consulting (July 2012 – Present): Consultant*Project:* Work with UMCSN to assess policy and funding opportunities that might be realized under an 1115 waiver of other policy changes. The goal is to sustain the hospital during a time of significant program transition.*Mr. Albertoni:* Provide consulting services to this safety net provider related to 1115 waivers and Affordable Care Act (ACA) policy guidance. Like many public hospitals, University Medical Center faces declining disproportionate share hospital funding as more individuals become insured under the ACA.**Division of Health Care Access and Accountability, State of Wisconsin**Wisconsin Health Care Access Expansion (September 2003 – December 2011): State Project Manager*Project:* Developed and implemented a hospital assessment that successfully yielded more than \$100 million revenue for the state while increasing reimbursement revenue to high volume Medicaid hospital providers.*Mr. Albertoni:*

- Medicaid HMO Plan Management: Served as a key member of the state management team that administered and monitored contracts with fourteen managed care plans. This involved identification and implementation of quality benchmarks, review of provider network requirements, development of capitation rates, oversight of provider and member appeals, and supervision of the HMO enrollment process. During this time, Wisconsin rapidly expanded participation rates in Medicaid managed care and modernized plan selection for greater consistency with commercial insurance enrollment processes.
- Income Maintenance Rationalization: Helped lead the state's effort to regionalize the county-based organizations that process and determine eligibility for Medicaid, the Supplemental Nutrition Assistance Program (SNAP), TANF and child care subsidies. The 72 county organizations successfully joined ten regional consortia which were certified in October 2011.
- CHIRPA Bonus Award: As the state's CHIP Director, successfully led an effort to bring the state into compliance with the program requirements of the bonus award authorized in the Children's Health Insurance Plan Reauthorization Act (CHIPRA). This resulted in a \$21 million award that was issued to the state in December 2010.
- Hospital Assessment: Served as the state project manager for development and implementation of a hospital assessment that successfully yielded more than \$100 million revenue for the state while increasing reimbursement revenue to high volume Medicaid hospital providers. Revenue generated through the hospital assessment became the cornerstone for funding the state's Medicaid expansion waiver to childless adults. Duties included development of fee-for-service and managed care supplemental payments to hospitals using assessment revenue, facilitating CMS

approval of state plan amendments and reimbursement methods and working with hospitals to maintain support of the initiative.

- Hospital Pay for Performance: Led the effort to implement the state's first performance-based payments to hospitals. Facilitated the approval of state plan amendments necessary to implement the payments, which allocated \$5 million in segregated revenue generated through the hospital assessment.
- Southeast Wisconsin HMO Enrollment Following Procurement: Directed the eligibility functions related to Wisconsin's first competitive procurement for managed care services, which focused on the Southeastern part of the state, inclusive of Milwaukee. The procurement process required 250,000 members to re-choose a health plan in coordinated phases over a 90-day period. While a goal of the project was to maximize member choice, this initiative also required establishing an auto-enrollment process that assigned market-share targets to HMOs based on their proposal cost scores. The initiative was successful in saving an estimated \$50 million in the biennium without continuity of care disruptions for members.
- Medicaid Childless Adults Waiver: Assisted with the development of the state's 1115 waiver to expand Medicaid eligibility to low-income childless adults. Directed the strategy to maximize and use disproportionate share hospital (DSH) funding as the basis of the state's budget neutrality demonstration. Helped develop the waiver terms and conditions. CMS approved the waiver in December 2008. By October 2009, the state had enrolled 65,000 uninsured individuals into the waiver.
- Public Provider Claiming: Directed efforts to improve the process under which the state completed cost settlements for state hospitals. Independently determined that the state had overlooked making settlement claims for its university hospital for past years. This finding resulted in a successful \$30 million federal funding settlement claim.
- Pharmacy Benefit Carve-Out: Directed the design and development of a state budget initiative to carve the pharmacy benefit out of managed care in order to maximize manufacturer rebate revenue. This effort required close coordination with the managed care organizations during the benefit transition. The initiative was successfully implemented in February of 2008 and saved \$25 million through June of 2009 while maintaining continuity of care for members. The change was embraced by the state's pharmacy mental health advisors, which included consumers, because it provided transparency and uniformity to the state formulary.
- SeniorCare Waiver Renewal: Helped lead the effort to gain approval for renewal of the SeniorCare pharmacy-only benefit waiver in 2007. SeniorCare leveraged Medicaid pricing discounts, manufacturer rebates, member cost-sharing and state and federal revenue to provide pharmacy benefits to seniors as an alternative to Medicare Part D.
- Adult Basic Health Plan: Directed the development of a state-administered member-funded, non-Medicaid health benefit plan for childless adults who remained on the waiver waitlist after enrollment in the childless adults waiver was capped due to federal budget neutrality limitations. Worked with staff to develop the limited benefit plan offered under Basic. Coordinated CMS approval to allow Basic members with acute medical needs to bypass the waiver waitlist and enroll in the waiver. BadgerCare Basic had enrolled 6,500 members by December 2010. Created mechanism to shift higher acuity Basic member to the Core plan to successfully manage Basic premium rates.

#### **Division of Health Care Access and Accountability, State of Wisconsin**

Various Departments (September 2003 – December 2011): Various Positions

*Mr. Albertoni:*

- Bureau of Enrollment Policy and Systems (January 2010 – December 2011): Director  
Supervised a staff of 55 employees who maintained responsibility for advising Department management on eligibility policy issues, maintaining the eligibility information technology (IT) system, developing and publishing eligibility handbooks, policy memos to



counties and member correspondence. The bureau was also responsible for quality control reviews to assure cases were being accurately determined for eligibility for both Medicaid and SNAP benefits. The eligibility bureau director incorporates a number of other position titles and functions, including the state SNAP Director, CHIP Director and contract administrator to the vendor who maintained our eligibility system. Chaired the monthly Income Maintenance Advisory Committee (IMAC) meetings. IMAC was comprised of county representatives who administered local eligibility agencies.

- Bureau of Fiscal Management (November 2007 – January 2010): Deputy Director  
Provided management direction to twenty employees responsible for hospital and managed care rate setting as well as general budget monitoring and compliance. Fiscal management staff provided leadership on many key Medicaid initiatives because issues of funding were critical to all major initiatives and program activities.
- Pharmacy and Hospital Section (September 2006 – November 2007): Section Chief  
Directed a staff of ten analysts responsible for hospital rate setting and all benefit policy analysis related to pharmacy and hospital.
- Pharmacy Budget and Policy (September 2003 – September 2006): Policy Analyst  
Responsible for developing and maintaining quarterly pharmacy utilization reports and provided guidance to claims systems staff on pharmacy reimbursement changes. Provided lead on several pharmacy projects, including the Preferred Drug List and utilization reviews.

#### **Madison Metropolitan School District, State of Wisconsin**

School District Project (January 2002 – September 2003): Budget Analyst

*Project:* Compiled key components of annual district budget presented for approval to the Board of Education.

*Mr. Albertoni:* Developed staffing models and personnel tracking tools to the Vice President for Business Services.

#### **Wisconsin Historical Society, State of Wisconsin**

##### **Health Insurance Marketplace and Arkansas Works Consultant, State of Arkansas**

Historic Sites Division (March 2000 – January 2002): Finance Director

*Project:* Provided annual budget development and monitoring for each of the Society's eight historic sites.

*Mr. Albertoni:* Worked with site directors to develop a revenue and seasonal staffing plan. Developed models to cross-reference revenue and staffing for profitability analysis. Reported site revenues to Society management and at Society board meetings.

#### **Wisconsin Division of Public Health, State of Wisconsin**

AIDS Drug Assistance Program (October 1994 – March 2000): Director

*Project:* Provided administrative coordination of this federally funded program that provided pharmacy assistance specific to antiretroviral and related AIDS medications to individuals living with HIV infection.

*Mr. Albertoni:* Generated Ryan White grant funding reports that were submitted to the Health Resource Services Administration (HRSA). Provided state leadership regarding policy analysis and biennial budget initiatives having an impact on the ADAP program. Worked with non-profit AIDS Service Organizations to assist them in enrolling eligible individuals into the program.

#### **Wisconsin Department of Health Services, State of Wisconsin**

Office of Policy and Budget (August 1992 – October 1994): Budget and Policy Analyst

*Project:* advised the Secretary on budget and policy issues related to economic support programs such as Aid to Families with Dependent Children (AFDC) and Supplemental Security Income (SSI).

*Mr. Albertoni:* Developed budget neutrality analysis for welfare reform waivers.

**New York Division of Budget, State of New York**

Budget Office (August 1990 – August 1992): Budget Examiner

*Project:* Analyzed and recommended annual budget of the State Judiciary.

*Mr. Albertoni:* Selected to participate in two-year state budget fellowship program in New York state government. Served as budget staff in the Public Protection unit of the Division of Budget.

**Division of Health Care Access and Accountability, State of Wisconsin**

Various Departments (September 2003 – December 2011)

Bureau of Enrollment Policy and Systems (January 2010 – December 2011): Director

Supervised a staff of 55 employees who maintained responsibility for advising Department management on eligibility policy issues, maintaining the eligibility information technology (IT) system, developing and publishing eligibility handbooks, policy memos to counties and member correspondence. The bureau was also responsible for quality control reviews to assure cases were being accurately determined for eligibility for both Medicaid and SNAP benefits. The eligibility bureau director incorporates a number of other position titles and functions, including the state SNAP Director, CHIP Director and contract administrator to the vendor who maintained our eligibility system. Chaired the monthly Income Maintenance Advisory Committee (IMAC) meetings. IMAC was comprised of county representatives who administered local eligibility agencies.

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Provided management direction to twenty employees responsible for hospital and managed care rate setting as well as general budget monitoring and compliance. Fiscal management staff provided leadership on many key Medicaid initiatives because issues of funding were critical to all major initiatives and program activities.

Pharmacy and Hospital Section (September 2006 – November 2007): Section Chief

Directed a staff of ten analysts responsible for hospital rate setting and all benefit policy analysis related to pharmacy and hospital.

Pharmacy Budget and Policy (September 2003 – September 2006): Policy Analyst

Responsible for developing and maintaining quarterly pharmacy utilization reports and provided guidance to claims systems staff on pharmacy reimbursement changes. Provided lead on several pharmacy projects, including the Preferred Drug List and utilization reviews.

**PROFESSIONAL BACKGROUND**

**Public Consulting Group, Boston, MA**

December 2011 – Present

**Wisconsin Medicaid, WI**

January 2003 – December 2011

**EDUCATION**

**University of Washington at Seattle, Seattle, WA**

Master of Public Administration, 1990

**Santa Clara University, Santa Clara, CA**

Bachelor of Arts in English, 1986

**Delivery Manager: Brett Tervalon**

Delivery Manager  
Public Consulting Group, Inc.

Mr. Tervalon has recently joined to PCG team as AVS Delivery Manager. Mr. Tervalon has over 20 years' experience managing the development, implementation and maintenance of complex and reliable applications. He has shown consistent on time, on budget delivery of flexible, reliable and scalable technology solutions in a variety of business situations. In his career, he has managed the design, production and support of several large-scale systems. Additionally, he has a proven ability to oversee systems architecture, analysis, application programming, quality assurance, operations support, database and training activities in a team environment. Mr. Tervalon holds a Bachelor of Science in Management from Bentley University.

**RELEVANT PROJECT EXPERIENCE****United Health Group/ Optum**

Vice President, Optum

*Consultant*

Harvard Pilgrim Health Care – Work with account leadership to successfully deliver and support a variety of solutions including Behavioral Health, Comprehensive Payment Integrity, Member 360 and Impact Intelligence Suite.

Medical Mutual of Ohio – In a turnaround situation, moved the client from an NPS detractor to a good business partner enabling renewal of Impact Intelligence suite. Additionally, paved the way for a Wellness & Coaching opportunity by resolving many open customer issues with existing products.

**Dell/ Perot Systems**

Customer Delivery Executive

*CareSource Account*

Manage implementation and production support for CareSource (a leading non-profit managed care company based in Dayton, OH) in support of their expanding Health Care operations in Ohio, Indiana and Kentucky.

Responsible for program delivery Dell proprietary Financial Management software for billing, the HIX (Health Insurance Exchange) Portal and integration of interfaces to third party systems.

Manage the customer relationship, ensure contract compliance and meet SLA targets.

Evaluate and present new opportunities to the customer.

**Dell/ Perot Systems**

Customer Delivery Executive

*MA Health Connector Account*

Manage implementation and production support for the MA Health Connector (Massachusetts' health insurance Marketplace where individuals, families, and small businesses can shop among the state's leading health insurance carriers) in support of the Affordable Care Act.

Responsible for multiple workstreams of program delivery including call center expansion and facilities build out of new real estate, implementation of Avaya phone system and IVR, Dell proprietary software for billing, integration with third party workflow software and integration of interfaces to third party systems.

Manage the customer relationship, ensure contract compliance and meet SLA targets.

Evaluate and present new opportunities to the customer.

**Dell/ Perot Systems**

Customer Delivery Executive

*Harvard Pilgrim Health Care Account*

**Oracle Health Insurance Manager (1/2012 – 4/2013)**

Manage production support for Oracle Health Insurance, the next generation claims adjudication engine for HPHC. Responsible for development, estimation, scheduling, delivery and support of OHI.

Responsible for planning of workload and resource scheduling for development projects and service requests. Work with HPHC business units to set priorities and expectations.

Manage the development and support team for the Accumulator Management System. Responsible for the development, estimation, scheduling, delivery and support of, a suite of 18 applications.

Ensure Member Statements are delivered to all the members on a monthly basis.

Developed the Test Data Hub, a team solely devoted to providing high quality test data for all of HPHC's development teams as part of the go-live effort for OHI. Created the team and processes and successfully transferred the team to a new Dell leader.

**Business Intelligence/ Analytical Reporting Team Manager (2/2009 – 12/2011)**

Manage a thirty person development and support team with members in Massachusetts and NOIDA, India. Responsible for architecture, development, estimation, scheduling, delivery and support of HPHC's Enterprise Business Intelligence projects. Technologies used: Teradata v2r5, MicroStrategy v9.0.1, Oracle APEX, Oracle Reports, Oracle Discoverer and others.

Successfully rolled out a new MicroStrategy installation and delivered several high-value Business Intelligence applications for HPHC in 12 months using Agile Methodologies.

Responsible for planning of workload and resource scheduling for development projects and service requests. Work with HPHC business units to set priorities and expectations.

As the leader of the MicroStrategy Architecture Committee, provide guidance on all MicroStrategy projects. Responsible for policies, plans and systems to ensure accurate and timely Business Intelligence solutions across the enterprise.

As a member of the Dell/Perot Leadership team, helped Harvard Pilgrim Health Care maintain the NCQA Ranking of #1 private health plan in the nation in 2010.

**ETL Development and Operations Manager (8/2007 – 1/2009)**

Manage a twenty person development team and seven person operations support team with members in Massachusetts, Colorado and NOIDA, India. Responsible for development, estimation, scheduling, delivery and support of HPHC's data warehouse projects. Technologies used: Teradata v2r5, Ascential Datastage v7.1, TIBCO web services, PL/SQL, Trillium and others.

Responsible for planning of workload and resource scheduling for development projects and service requests. Work with HPHC business units to set priorities and expectations.

As a member of the Enterprise Data Warehouse architecture team, provide guidance on all EDW projects. Responsible for policies, plans and systems to ensure accurate and timely data in EDW.

As a member of the Perot Management team, helped the Harvard Pilgrim account win the award for Perot account of the year in 2007. Achieved this by meeting all SLAs and delivering on-time on budget projects.

**Systems Consultant/Business Analyst (6/2005 – 7/2007)**

Responsible for requirements gathering, business analysis, data modeling, developing ETL specifications, test plans, obtaining business approval for projects, keeping project plans current and communicating status of all deliverables. Technologies used: Teradata v2r5, Ascential Datastage v7.1, TIBCO web services, PL/SQL, Trillium and others.

Member Individualization Project: Design and implementation of a Trillium-based solution for Individualizing HPHC's membership within the EDW (Enterprise Data Warehouse)

External Pharmacy Benefits Management Project: Data Integration of 3rd party pharmacy data into the EDW from multiple sources.

EDW Track 1 Prototype: Successful Incorporation of 3rd party data (National PPO Joint Venture with UHG) into the EDW. Co-developed the overall system architecture, developed requirements, developed specifications and contributed to test plans.

**EDUCATION**

**Bentley University**  
B.S. Management

**Operations Manager: Brenda Baldwin, MSA***Senior Advisor*

Public Consulting Group, Inc.

Mrs. Baldwin is a PCG Senior Advisor with more than a decade of experience in public sector welfare eligibility and system implementation.

Currently, Mrs. Baldwin works as PCG Health's member integrity group's portal production owner as Project manager for Wisconsin Residency Verification Project and has been part of the AVS team for benefits identity and eligibility verification system implementations on behalf of health and human services agencies in New York, Oklahoma, North Carolina, Wisconsin, Massachusetts, New Jersey, Texas, Maine, Nevada, South Dakota, West Virginia, New Hampshire, and the District of Columbia, program integrity audits on behalf of the states of North Carolina, Oklahoma, and Massachusetts.

Brenda earned her B.A. in Criminal Justice from Michigan State University and her M.S.A. from Central Michigan University.

**RELEVANT PROJECT EXPERIENCE**

**Project:** Asset Verification Services (10-2015 to present)

Description of Role: Senior Advisor

Description of Project: Web-based asset verification services

**Client:** Department of Health, State of New York

**Project:** Asset Verification and Real Property Resource Verification System (10-2015 to present)

Description of Role: Senior Advisor

Description of Project: Working directly with the state workers on scenarios and policy needed for testing on the electronic asset and real property verification system to be used to insure the assets held by Medicaid applicants and beneficiaries do not exceed program limits and to direct eligibility decision making.

**Client:** Trauma Fund, State of Oklahoma

**Project:** Trauma Fund Audit

Description of Role: Auditor

Description of Project: Review submitted medical documents and verify accuracy of billing and funds received from the Trauma Fund through review of financial accuracy and medical necessity of uncompensated care payments made to hospitals, physicians, and EMS providers around the State.

**Client:** Department of Human Services, State of Georgia

**Project:** Integrated Eligibility System

Description of Role: Professional Script Writer

Description of Project: Reviewed policy and requirements for the new integrated eligibility system and wrote scenarios in order for the state eligibility workers to properly test the eligibility system and ensure all screens were working according to requirements and results were generated according to policy.

**Client:** Department of Human Services, State of New Mexico

**Project:** Integrated Eligibility System

Description of Role: QAT Tester

Description of Project: Quality Assurance Testing for automated eligibility system designed to determine eligibility for multiple assistance programs at one time. Ensured all screens were working according to requirements and results were generated according to policy.

**Client:** Department of Health and Human Services, State of Michigan  
**Project:** Medicaid Compliance  
**Description of Role:** Senior Business Analyst  
**Description of Project:** Quality Assurance Testing for MAGI integrated into the Integrated Eligibility System. Ensured all screens were working according to requirements and results were generated according to policy. Managed testing for the MIHealth Account implementation, worked as liaison between State of Michigan Medicaid workers and Maximus.

**Client:** Department of Health and Human Services, State of Michigan  
**Project:** Welfare Eligibility  
**Description of Role:** Assistance Payments Supervisor  
**Description of Project:** Supervised staff, train new workers, read cases and monitor reports. Provided support, direction to staff to ensure proper application of policies and procedures related to financial, medical, food assistance, and emergency assistance programs. Directed activities and provided assistance to Eligibility Specialists in the process of registration and eligibility determination of Medicaid, FAP, CDC, SER, and SDA. Evaluated performance and skill development of subordinate staff, monitor staff workload, management techniques and completed work assignments. Conducted staff meetings and trainings instructing staff on policies and procedures. Reviewed subordinate staff casework to ensure accuracy and timeliness, completed staff performance evaluations and took disciplinary action when necessary. Trouble shot computer issues; and participate in meetings with outside agencies.

## PROFESSIONAL BACKGROUND

### **PUBLIC CONSULTING GROUP, INC.**

2015 - Present

### **Engility Corp (Previously DRC)**

Business Analyst

2014- 2015

### **Teksystems, Contractor for the State of Michigan**

Senior Business Analyst

2013- 2014

### **Deloitte Consulting**

Professional Script Writer, 2015

QAT Tester 2013 - 2013

### **State of Michigan, Department of Human Services**

Assistance Payment Supervisor, 2010-2013

Lead Worker, 2009- 2010

Assistance Payment Worker, 2006-2009

## EDUCATION

### **Central Michigan University**

MSA

### **Michigan State University**

B.A. Criminal Justice

**Associate Project Manager: Kalen Summers, MA, PMP**

Consultant  
Public Consulting Group, Inc.

Kalen Summers is a Consultant in PCG's Boston, MA office. He is a certified Project Management Professional (PMP) and Lean Six Sigma Black Belt. He currently organizes and assists in the day-to-day operations of numerous projects where his technical expertise is used in data forecasting, analyzing, and problem solving. Most recently, Mr. Summers is working as the Associate Project Manager with the District of Columbia and State of South Dakota to implement an electronic asset verification solution to be used to verify the resources of ABD applicants and beneficiaries. Additionally, Mr. Summers has worked with the Oklahoma Trauma Fund for the last four years by actively managing these audits and team members. Mr. Summers also oversaw the development of the case tracking system used by Oklahoma State and all audited providers. Lastly, he has worked on the day-to-day operations and managing of multiple Disability Benefits Management (DBM) projects including United Auto Workers (UAW), Caterpillar Incorporated, and Whirlpool Corporation.

Kalen received a Masters of Art in Economics at the State University of New York at Buffalo and a Bachelors of Science at Brigham Young University – Hawaii in International Business with a minor in Economics.

**RELEVANT PROJECT EXPERIENCE****Department of Human Services, District of Columbia**Asset Verification Services*Associate Project Manager*

Manages implementation of electronic asset verification solution into existing state eligibility system to be used to verify the resources of ABD applicants and beneficiaries.

**Department of Social Services, State of South Dakota**Asset Verification Services*Associate Project Manager*

Manages implementation of electronic asset verification solution into existing state eligibility system to be used to verify the resources of ABD applicants and beneficiaries.

**Department of Health, State of New York**Asset Verification Services*Data Analyst*

Assisted in deployment of electronic identity and asset verification solution used to verify the identity and resources of ABD applicants and beneficiaries.

**Executive Office of Health and Human Service, State of Massachusetts**Asset Verification Services*Data Analyst*

Assisted in deployment of electronic identity and asset verification solution used to verify the identity and resources of ABD applicants and beneficiaries.

**Department of Health and Human Services, Division of Medical Assistance, State of North Carolina**Asset Verification Services*Data Analyst*

Assisted in implementation of electronic asset verification solution into existing state eligibility system to be used to verify the resources of ABD applicants and beneficiaries.



**Department of Health and Human Services, Division of Family Assistance, State of New Hampshire**

New Hampshire Enrollment Data Analysis Services

*Data Analyst*

Assisted in design and deployment of electronic identity and asset verification solution used to verify the identity and resources of ABD and MAGI applicants and beneficiaries.

**Department of Health, State of Oklahoma**

Trauma Fund Audit

*Project Manager*

Coordinated statewide provider audit of the financial accuracy of uncompensated care payments made to 100 hospitals, physicians, and EMS providers.

**Department of Health Services, State of Wisconsin**

Residency Verification Services

*Data Analyst*

Assisted in implementation and deployment of electronic residency verification system to be used to identify the residency of Medicaid applicants.

**UAW Retiree Medical Benefits Trust**

SSDI and Medicare Enrollment

*Data Analyst*

Involved with SSDI and Medicare enrollment engagement for the UAW RMBT that includes a population of over 800,000 retirees from Ford, GM and Chrysler. Achieved over 1,500 SSDI allowances, reducing UAW RMBT healthcare costs by more than \$30M per year as these members transition to Medicare.

**Caterpillar Incorporation**

Disability Benefits Management

*Project Manager*

Managed project to identify disabled non-Medicare, early retirees covered under employer-sponsored health plan. Provided data analytics, SSDI application and advocacy, and Medicare enrollment services.

**Whirlpool Corporation**

Disability Benefits Management

*Project Manager*

Managed project to identify disabled non-Medicare, early retirees covered under employer-sponsored health plan. Provided data analytics, SSDI application and advocacy, and Medicare enrollment services.

**EDUCATION**

**State University of New York at Buffalo, Buffalo NY**

Masters of Arts in Economics, 2011

**Brigham Young University-Hawaii, Laie, HI**

Bachelors of Science in International Business Minors: Economics, 2009

Minors: Economics

**Implementation Manager: Stephen Myers**

Senior Advisor  
 Public Consulting Group, Inc.

Mr. Myers is a PCG Senior Advisor with more than a decade of experience in Medicaid eligibility, operations, and system implementation. While with the State of New Jersey's Department of Human Services, Mr. Myers was the eligibility and operations lead for the Affordable Care Act implementation, the project manager for the State's Asset Verification System integration, and oversaw eligibility policy and quality control for the State's Medicaid program.

Currently, Mr. Myers works in PCG Health's Payer Services group, serving as the Assistant Project Manager in Texas' Data Broker Service, where the State's benefits eligibility system is connected to nearly 50 data sources, providing applicant data in order to assist the State in facilitating eligibility verification processes more efficiently and effectively. Mr. Myers also serves as the Implementation Lead for the State of Wisconsin's Asset Verification project, working with the project management team to coordinate implementation documentation, fulfilling reporting, training, and operations activities throughout the engagement.

Mr. Myers earned his B.A. in Criminal Justice from York College of Pennsylvania.

**RELEVANT PROJECT EXPERIENCE**

**Health and Human Services Commission, State of Texas**

Data Broker Services

*Assistant Project Manager*

Mr. Myers assists the Project Manager with the operations of a data broker service linking the State's benefits eligibility system to nearly 50 different federal, state, and commercial data sources and applying more than 500 predictive analytics data matches in order to expedite worker identity and eligibility verification procedures and enhance HHSC's ability to identify fraud and/or ineligibility across all public assistance programs.

**Department of Health Services, State of Wisconsin**

Electronic Asset Verification

*Implementation Lead*

Mr. Myers is assisting the project management team with the implementation of PCG's electronic asset verification data service into the State's benefits eligibility system in order to inform workers about bank accounts and other assets maintained by Medicaid Long Term Care applicants.

**PROFESSIONAL BACKGROUND**

**Public Consulting Group, Inc.**

Senior Advisor  
 2017 – Present

**State of New Jersey, Department of Human Services**

Chief of Quality Control, 2016-2017  
 Senior Eligibility Manager, 2014-2016  
 Policy Supervisor, 2012-2014  
 Policy Analyst, 2009-2012

**EDUCATION**

**York College of Pennsylvania**  
B.S. Criminal Justice

**Data Lead: Jason Balaban**  
Senior Director, Government Services  
Accuity Asset Verification Services Inc.

Mr. Balaban is an asset verification pioneer having assisted the Social Security Administration in piloting AVS in 2010 and managing SSA's SSI AVS operations ever since. Mr. Balaban helped established and oversees Accuity's network of 100% of the financial institutions in the United States and is one of the nation's foremost AVS data experts, having assisted more than a dozen agencies in implementing AVS data into their eligibility determination processes and systems to date.

### RELEVANT PROJECT EXPERIENCE

**Client:** Social Security Administration

Project: Access to Financial Institutions (2005 to present)

Description of Role: Operations, Data and FI Network Management

Description of Project: To obtain services that will support the SSI program by using the Access to Financial Institutions (AFI) Program to verify accounts, account balances and interest income for applicants, recipients and/or deemors.

**Client:** Florida Department of Children and Families

Project: Asset Verification System (2/2012 to present)

Description of Role: Operations, Data and FI Network Management

Description of Project: Purchasing the operation of an electronic solution for the asset verification system to detect assets held by financial institutions of aged, blind or disabled Medicaid applicants and recipients.

**Client:** Maryland Department of Human Resources (Subcontract with Autogov.com)

Project: AVS Project (4/2011 to 8/2014)

Description of Role: Operations, Data and FI Network Management

Description of Project: Implementation of an asset verification system

**Client:** New Hampshire Department of Health and Human Services

Project: Enrollment Data Services Analysis Project (10/2011 to 10/2014))

Description of Role: Operations, Data and FI Network Management

Description of Project: Establishment of an eligibility portal including asset verification data to assist staff in eligibility determination

**Client:** North Carolina Department of Health and Human Services

Project: Asset Verification Services Project (2/2013 to present)

Description of Role: Operations, Data and FI Network Management

Description of Project: Web-based asset verification services

**Client:** New York Department of Health

Project: Asset Verification and Real Property Resource Verification Project (10/2013 to present)

Description of Role: Operations, Data and FI Network Management

Description of Project: Identifies assets and real property held at various financial institutions or by the applicant/recipient for selected Medicaid applicants and recipients.

**Client:** Westchester County, New York Department of Social Services

Project: Asset Verification Project (11/2013 to present)

Description of Role: Operations, Data and FI Network Management  
Description of Project: Provision of ban clearance through an internet-based system

**Client:** Michigan Department of Technology, Management and Budget Procurement

Project: Asset Test Service Project (6/2013 to present)

Description of Role: Operations, Data and FI Network Management

Description of Project: Establishment of an electronic test system for asset verification

**Client:** Oklahoma Health Care Authority

Project: Asset Test Service Project (8/2014 to present)

Description of Role: Operations and FI Network Management

Description of Project: Establishment of an electronic system for asset verification

**Client:** Virginia Department of Social Services

Project: Asset Verification Services (10/2015 to present)

Description of Role: Operations and FI Network Management

Description of Project: Establishment of an electronic system for asset verification

**Client:** Arkansas Department of Human Services

Project: Asset Verification Services (8/2015 to present)

Description of Role: Operations and FI Network Management

Description of Project: Establishment of an electronic system for asset verification

## PROFESSIONAL BACKGROUND

Accuity, Inc.

2004 to present

## EDUCATION

Master of Business Administration

University of Phoenix, Tempe, Arizona - 2007

BAA – Finance

University of Wisconsin – Whitewater - 2004

**Software Engineering Manager: Adam Knowlton**  
**Software Engineering Manager**  
 Public Consulting Group, Inc.

**RELEVANT PROJECT EXPERIENCE**

**New York Department of Health, Bureau of Early Intervention, State of New York**

State Fiscal Agent

*Mr. Knowlton:* Designed and developed a claims payment system and data warehouse to support PCGs role as New York’s DOH EI State Fiscal Agent. The system validates over 9M Early Childhood claims on an annual basis, submits claims to multiple payers for adjudication and pays claims. The snowflake designed data warehouse intakes all data through ETL processes (Microsoft SSIS) and is used for reporting and analysis. Architected fully automated Adjudication, Coordination of Benefits, and Third Party Liability Engines. The system provides full support for automated HIPAA X12 EDI transactions to and from both providers and payers. Served as Lead Architect responsible for designing a multi-payer system with integration points with 4 other systems and over 100 X12 EDI Trading Partners.

**Department of Education, State of Arizona**

Medicaid Claims Payment System

*Mr. Knowlton:* Manages the support and feature development of a claims TPA system to administer and issue payment of Medicaid IEP claims for the State of Arizona. The system serves the functions of Provider Maintenance, Member Eligibility, Claim Validation, and Paper Check issuing. The system provides full support for automated HIPAA X12 EDI transactions to and from both providers and payers. Served as Development Manager and Tech Lead of project.

**Medicare Part D, States of Michigan, North Carolina, and Florida**

Post Pay Program Integrity

*Mr. Knowlton:* Manages the support and feature development of a TPA system to administer and process Medicaid Part D claims for multiple states in the country. The system takes in Eligibility and Claiming files from the states and validates the claims, prior to processing for payments. The system integrates with each state’s system for member and eligibility information. The system is also responsible for reporting on several different analysis models to each individual state. Served as Development Manager and Tech Lead of project.

**EDUCATION**

St. Anselm College

**Certifications / Publications / Special Skills**

Expert in HTML, HTML5, CSS, ‘C’, C++, C#, ASP.NET, Silverlight, Flash, MVC, MVVM, Entity Framework, SSIS ETL, SSRS Reporting, Crystal Server Reporting, OBIE, SAS, T-SQL, X12 EDI HIPAA, BizTalk, Agile Scrum Master

**PROFESSIONAL BACKGROUND**

**Public Consulting Group**

March 2013 – Current

*Software Engineering Manager*

In this role Mr. Knowlton leads the software development group for PCG’s Health Practice area, reporting directly to the CTO. The thirty person development group focuses on developing claims payment application, program integrity web applications, very large data warehouses and program eligibility processing.

**Conservation Services Group**

May 2009 – March 2013

*Applications Development Manager, Scrum Master*

Mr. Knowlton served as the Application Development Manager reporting directly to the CTO. He led architecture and development of several extremely large scale client projects while at CSG, which is focused on providing software and consulting services to the utility industry. His group developed Web applications for large Electric Energy producers to measure and validate efficiency measures of “in home” Energy Efficiency improvements across seven states and issue homeowner rebates on behalf of the Power Distributors.

**Optical Phusion, Inc,**

May 2005 – December 2010

*Director of Technology and Engineering*

Mr. Knowlton led a large software engineering team to design, develop, and deploy complex systems in the Retail Industry focused on Inventory Control and Distribution purposes. The applications he designed and implemented involved both hardware and software web based solutions which could be accessed from both desktop and industrial mobile devices. He was an early adopter of the Agile Development Methodology and implemented it at Optical Phusion where it remains the standard methodology to date.

**Delivery Director: David Falco**  
**Director of Delivery Management**  
Public Consulting Group, Inc.

Mr. Falco has over 30 years' experience in high technology. His broad experience includes cloud computing, telecommunications, mobile systems, text and voice messaging systems, Internet applications, security, EDI, data analysis and multimedia. David has spent the last five years using that experience in the health care field delivering solutions to agencies in numerous states.

### RELEVANT PROJECT EXPERIENCE

#### **Public Consulting Group, Boston, Massachusetts**

(April 2012 to Present): Director of Delivery Management

Lead a team of Business Analysts, Quality Assurance Engineers, Technical Writers, System Engineers and Delivery Managers in the design and delivery of third party administrative systems to health care organizations and state governments for Medicaid, Medicare and private payer reimbursement.

#### **Office of Health and Human Services, Commonwealth of Massachusetts Commonwealth Care Alliance**

Third party administration for individualized healthcare programs for Medicare and Medicaid eligible individuals. The system serves the functions of Provider Maintenance, Member Eligibility, Claim Validation, and payment. The system provides full support for automated HIPAA X12 EDI transactions to and from both providers and payers.

#### **Office of Health and Human Services, State of New York Independence care System**

Third party administration for a care system that coordinates a wide range of home care, health care and social services to enable senior adults and people with disabilities or chronic conditions to live as independently as possible. The system serves the functions of Provider Maintenance, Member Eligibility, Claim Validation, and payment. The system provides full support for automated HIPAA X12 EDI transactions to and from both providers and payers.

#### **Department of Health Care Finance, District of Columbia**

Third party administration for individualized healthcare plans for medical services received through the DC public school system. The system serves the functions of Provider Maintenance, Member Eligibility, and Claim Validation. The system provides full support for automated HIPAA X12 EDI transactions to and from both providers and payers.

#### **Department of Education, State of Arizona**

Third party administration system to for the administration and payment of Medicaid IEP claims for the State of Arizona. The system serves the functions of Provider Maintenance, Member Eligibility, Claim Validation, and Paper Check issuing. The system provides full support for automated HIPAA X12 EDI transactions to and from both providers and payers.

### EDUCATION

#### **Suffolk University, Boston, MA**

Master in Business Administration, 1983

Bachelor of Science in Business Administration, 1982

#### **Certifications / Publications / Special Skills**

- Project Management Institute, Certified Program Management Professional(PMP)
- Scum Alliance, Certified Scrum Master

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## PROFESSIONAL BACKGROUND

### **VCE Marlborough, MA (2011 – 2012)**

#### **Senior Program Manager – Business Operations.**

Plan and execute initiatives in support of corporate goals for cloud computing systems.

### **Yahoo Cambridge, MA (2009 – 2010)**

#### **Senior Program Manager - Cloud Computing Platform Group.**

Lead the program team in the development and delivery of all video applications for Yahoo sites worldwide

### **Nokia Burlington, MA (2000 – 2009)**

#### **Senior Program Manager – Messaging Solutions. (2004 -2009)**

Lead a team of four program managers and chair the program team in the development and delivery of Nokia Email Service, Nokia's first major Internet service.

#### **Program Manager – Security Software. (2000 to 2003)**

Lead management team comprised of managers from all departments in the development and delivery of Nokia Message Protector; an anti-spam, anti-virus firewall system for corporate deployments

### **Comverse Network Systems Andover, MA (1997 – 2000)**

#### **Senior Engineering Project Manager**

Create and manage teams that designed and delivered multimillion-dollar carrier grade messaging systems.

### **Various other positions**

**Digital Equipment Corporation, Lotus Development Corporation.**



**Systems Engineer: Naresh Kommineni**  
**Delivery Manager**  
Public Consulting Group, Inc.

## PROFESSIONAL EXPERIENCE

### **PCG, AUSTIN, TX - JULY 2016 – Present**

#### **TECHNICAL DELIVERY MANAGER**

- Work closely with HHSC and the previous vendor in identifying all technical requirements associated with the takeover of the data broker system. This includes capturing the technical functions and generating the documentation to support the requirements, user stories and acceptance criteria.
- Presented the user stories to the HHSC product team in order to obtain HHSC approval of the requirements.
- Relayed all requirements to the development team and supported the developers with a clear understanding of the requirements.
- Carries the responsibility of the SCRUM master to ensure that the development is performed accurately and efficiently.
- Provides constant feedback to PSG and to HHSC project management to ensure that communication channels remain open and clear. Conveys positive feedback on the progress and addresses any all challenges in a positive manner, offering creative and viable options.
- As the Delivery Manager, responsible for making sure projects goals are understood and effectively conveyed to the development team.
- Provide overall project management of the development of the system, organizing and scheduling the work of the developers to ensure a successful implementation of the system.

### **MAXIMUS, AUSTIN, TX - JAN 2008 – Feb 2016**

#### **SOLUTION ARCHITECT/SOFTWARE DEVELOPMENT MANAGER**

- Managed all facets of design, implementation and deployment of key systems to end-users, all while managing a team of developers and ensuring projects were completed on time and within budget.
- Oversaw the redesign and implementation of state wide rollout of the Enrollment Broker (EB) application, which included changes required by the Affordable Care Act.
- Created methodology for data conversion from CHIP into TIERS and then on to the EB system. Implemented the changes using the ETL Tool Pentaho Kettle.
- Responsible for the overall database design
- Create/Maintain data model in Oracle designer (Similar to ERWIN). Create Entities, Attributes, Tables, E-R Diagrams and generate scripts to create tables in the Oracle database.
- Automated the CHIP eligibility and enrollment batch scheduling system that significantly improved the process and shaved 2 days off the cut off process per month. The complete batch scheduling system was written in PL/SQL.
- Led a team of 5 developers to design the data migration from legacy system to MAXEB system and the Children's Insurance Self Service Portal Application. Implemented the changes using the ETL Tool Pnetaho Kettle.
- Mentored and provided guidance to development leads on projects.
- Managed a team of 15 developers and developer leads by providing outstanding leadership, performing reviews and providing guidance.
- Responsible for estimating development effort and working with project managers to manage scope and schedules.
- Designed and implemented system improvements to increase tracking efficiency and compliance with audit findings. Used JIRA to implement these changes.
- Manage certifying defects (Defects tracked in JIRA) prior to product launch and ensuring proper approvals are in place beforehand.
- Managed systems to ensure adherence to HIPAA guidelines.
- Worked with key stakeholders in the design of data exchange utilizing Web Services and data

validations.

- Represented the company in requirement gathering and status meetings with internal and external stakeholders.
- Led performance tuning of application through use of TKPROF, AWR, ADDM, trace files and PL/SQL developer profiler; decreased the response time by more than 80%.
- Created PL/SQL procedures, functions, packages and triggers in Oracle.
- Developed front end application in Oracle Forms.
- Created roles and user privileges to maintain data security at the database level and also the application level.

**Environment:** Oracle 10g/11g/12c, Pentaho Data Integration and Business Analytics Suite (ETL Tool), Oracle Forms Developer 2000(Re 6i/10g), Oracle Designer 2000 (Re 6i/9i), PL/SQL Developer, JSF, Richfaces, Struts, Javascript, JQuery, Spring, Quartz Scheduler, Restful Webservices, SOAP Webservices, Micro WebServices for SOA, hybernate, iBatis, JAVA Persistence API (JPA), LDAP, Log4J, SL4J, Tomcat, Oracle Application Server, JIRA, HP ITG, HP MQC.

**PPD, AUSTIN, TX - Nov 2003 – SEP 2007**

**SENIOR SYSTEMS DEVELOPER**

- Performed systems analysis and created system design documentation and acted as first line of contact for end users.
- Created and implemented a system to capture, display and report audit trail across the enterprise-wide system, reducing the need for writing customized reports.
- Tasked with developing and implementing various efficient interface systems in Oracle forms.
- Developed reports using Oracle Reports and SQR.
- Educated and mentored 3 junior developers and review work for quality control.
- Responsible for creating/maintaining Entities, E-R diagrams and generating table creating scripts using Oracle Designer (Similar to ERWIN).
- Created PL/SQL procedures, functions, packages and triggers in Oracle.
- Created functionality for supervisors to login to the application, approve the change and the system would log the user back into the application automatically.
- Created roles and user privileges to maintain data security at the database level and also the application level.
- Work under the 21CFRPART11 regulations

**Environment:** Oracle 7/9i/10g, Developer 2000(Re 6i/10g), Windows 2000, HP-UX 10/11, SQR 8, 8.2, 8.5, Designer 2000 (Re 6i/9i), Crystal Reports (9/10), BARTENDER Barcode Software (5.0/6.0), Quest Database Replication Software, **PL/SQL Developer**

**MILLENNIUM PHARMACEUTICALS, CAMBRIDGE, MA - Aug 2001 – FEB 2002, JUN 2003 – Nov 2003**

**SENIOR SYSTEMS ANALYST**

- Essential representative tasked with programming and validating PL/SQL edit checks for oncology and metabolic studies.
- Streamlined processes by creating and reviewing process guides for easy reference and training.
- Mapped fields in the annotated CRF to metadata to ensure consistency checks could be completed.
- Educated and mentored 6 new and junior programmers in developing and validating edit checks.
- Created PL/SQL procedures, functions, packages and triggers in Oracle.
- Developed add-on forms and reports for the system.

**Environment** : Oracle 8i, Sun Solaris, Developer 2000, Windows NT/2000, **TOAD**.

**PPD, AUSTIN, TX - MAR 1997 – AUG 2001**

**SENIOR SYSTEMS ANALYST**

- Tasked with developing and implementing various efficient interface systems in Oracle forms.
- Developed reports using Oracle Reports and SQR.
- Created various third party software and demographic data to streamline processes and ensure maximum efficiency.
- Created user interface between clinic application and EZPRO and also created screens to view lab data from the EZPRO system.
- Developed a process for adjusting system time to reflect the current time for each site using the clinics application based on time zones.
- Reverse engineered all the tables into Oracle Designer and converted the tables into Entities/Attributes.
- Created/ Maintained the Entities, Tables after the conversion and created E-R diagrams in Oracle Designer (Similar to ERWIN).
- Created PL/SQL procedures, functions, packages and triggers in Oracle.
- Created SAS transport files using TABLETRANS from tables in Oracle Database. The SAS transport files are sent to sponsors.
- Created roles and user privileges to maintain data security at the database level and also the application level.
- Created tables, indexes and constraints, performed performance tuning.
- Used Enterprise Manager to look at users, tables, privileges, locks and sessions. Killed any locks that got created so users can start working.
- Created Unix scripts to transfer all the application files to all the servers all over US. This also had a partial additional ability of Source Control.

**Environment** : Oracle 7/8i, Developer 2000(Re 1/6/6i), Windows 95/2000, HP-UX 10/11, SQR 3/4/6, Citrix Winframe 3.51, Designer 2000 (Re 1/2), Crystal Reports (7/7.5), BARTENDER Barcode Software (5.0/6.0), EZPRO (3.0)

**DOW CHEMICAL, DETROIT, MI - JAN 1996 – FEB 1997****PROGRAMMER/ANALYST**

- Charged with analyzing, reviewing and presenting problems faced by programmers at DOW Chemical across projects to Oracle Corporation and ensuring problem resolution.
- Compiled and reviewed user requirements in order to develop efficient interfaces for provisioning of Industrial Hygiene systems utilizing Oracle forms and reports.
- Designed and implemented problem solution repository for Oracle Developers on DOW Intranet.
- Created PL/SQL procedures, functions, packages and triggers in Oracle.

**Environment** : Oracle 7.1 Developer 2000(Re 1.0), Windows 95

**EDUCATION****Post Graduate Diploma in Computer Applications**

FRONTIER INFORMATION SYSTEMS | Hyderabad, India

**Bachelors of Science in Electronics & Communication Engineering**

HINDUSTAN COLLEGE OF ENGINEERING, UNIVERSITY OF MADRAS | Chennai, India

**PMO Lead: Shawn Kotoske**  
Project Management Lead  
Public Consulting Group, Inc.

As the PCG Health PMO Manager, Mr. Shawn Kotoske manages the PCG Health Project Management Office and is responsible for implementing a common approach to project management and standard across the Health Practice Area. In addition, he manages the Product Owner role and business-side SDLC for PCG Health Software Development and oversees PCG Health's Business Continuity program. For eight years prior to holding this position, he was a PCG consultant in both the Education and Healthcare practice areas, which gives him in-depth and sophisticated understanding of the healthcare policy landscape. He is also a PMI-certified PMP, Scrum Alliance CSM, and a DRII ABCP. Mr. Kotoske served in the military in various Military Intelligence positions for over 9 years, and was awarded the Bronze Star for successfully directing signals intelligence operations for the southern half of Iraq during Operation New Dawn. He earned his Bachelor of Arts in philosophy from the University of Notre Dame, and a Master of Education in education policy and management from the Harvard Graduate School of Education.

#### RELEVANT PROJECT EXPERIENCE

**Project Management Office (PMO) Manager**  
**Direct a PCG Health Project Management Methodology**

Established the Project Management Office to implement a common project management methodology across all PCG Health projects. Meets with project managers to secure a practice area-wide understanding of project management best practices. Ensures that all projects comply with PMI-approved PMBOK project management principles.

**Manage Product Owner Role for All PCG Health Software Development**

Manages team in charge of Health software development and testing. Writes user stories, tests, and implements healthcare software systems.

**Oversee PCG Health Business Continuity**

Gathers up-to-date project information from CoE and Business Unit leads for use in a Business Impact Analysis. Institutes a crisis-response strategies (in conjunction with PCG Health ITD) to ensure delivery of services in the face of disruptive incidents.

**North Carolina Department of Medical Assistance**  
**North Carolina Physician UPL**  
**Project Manager**

PCG administered revenue maximization to the upper payment limit for NC physician practice plans. PCG performed annual Average Commercial Rate calculations, processed quarterly supplemental payments and annual reconciliations, and provided necessary audit support. Project Manager: Manage project operations and client relations for UNC HC and ECU Physicians. Established several new methodologies to maximize revenue for clients more than 50%. Developed database, performed calculations, and established uniform process for Average Commercial Rate, supplemental payments, annual reconciliations, and project documentation.

**Texas Health and Human Services Commission**  
**Texas 1115 RHP DSRIP Review**  
**Project Manager**

PCG assisted Texas HHSC with the technical review of Regional Health Partner DSRIP proposals to ensured compliance with 1115 waiver requirements and RHP goals. Project Manager: Managed 10 PCG team members in completing 195 reviews. Designed and implemented review team workflows and managed team resources.

**University Medical Center of Southern Nevada  
UMCSN 1115 Waiver Analysis****Project Manager**

PCG advised UMCSN on a potential Medicaid 1115 Waiver to secure current federal funding levels and take advantage of new revenue opportunities through quality improvements and cost-saving reforms. Project Manager: Manage all aspects of project and client relations. Developed white paper that proposes a potential 1115 waiver amendment for UMCSN.

**Wisconsin Department of Health Services****Wisconsin Physician UPL****Project Manager**

PCG administered revenue maximization to the upper payment limit for University of Wisconsin Medical Center. PCG performed tri-annual Average Commercial Rate calculations, processed quarterly supplemental payments and annual reconciliations, and provided necessary audit support. Project Manager: Manage all aspects of project and client relations. Developed database, performed calculations, and established uniform process for Average Commercial Rate, supplemental payments, and project documentation.

**District of Columbia Department of Behavioral Health****DMH BH Rate Setting****Project Management**

PCG conducted a cost survey of 6 providers, performed in-depth analysis, reported all findings, and made rate-setting suggestions for DC Department of Mental Health. This was followed up with a financial impact analysis and report combining all PCG's work into a single comprehensive document with suggestions. Project Manager: Manage all aspects of project to include client deliverables and relations.

**Ohio Department of Veterans Services****Examination of Veterans Services****Project Team Leader**

PCG conducted a study to collect, among a sampling of 50 states, functional models that examine four key categories: the structure and function of veterans services offices at the state and local level, including the process of appointing officials; funding both for state and local/county veterans services; the function and capabilities of power of attorney services for veterans claims; and marketing, outreach and advocacy to veterans.

**EDUCATION****Harvard Graduate School of Education**

Ed. M. Education Policy and Management  
2008

**University of Notre Dame**

B.A. Philosophy  
2006

**PROFESSIONAL BACKGROUND****United States Army (Active and Reserve)**

09/03 – 06/2012

**Intelligence Officer (CPT)**

Awarded The Bronze Star for successfully directing signals intelligence operations for the southern half of Iraq during Operation New Dawn. Held various Military Intelligence positions over almost 10 years of service including, Division Signals Intelligence Officer-in-Charge, Brigade Staff Intelligence Officer, Tactical Intelligence Officer, Company Executive Officer, and Platoon Leader. Supervised and developed

hundreds of soldiers through formal professional and personal counseling including quarterly performance evaluations and goal planning.

**Accuity Service Manager: Chaithanya Thathineni***Software Engineer III*

Accuity Asset Verification Services, Inc.

More than 8 years of experience in Java/J2EE and full software life cycle development involving analysis, design, technical documentation, development and implementation, production support, application deployment and environment support, maintenance of application in complex, high performance, object oriented multi-tier Internet and Intranet within time and budgetary constraints. Expert in information systems technology, project planning, strategic planning, systems analysis and troubleshooting, quality control, forecasting, scheduling and tracking of results. An effective and proactive team player who continuously seeks opportunities to master new domains and technologies.

**CORE COMPETENCIES**

- J2EE Web application development
- Development of SOAP/RESTful Webservice
- EMC Documentum and Liferay Portlets
- Debugging & optimizing memory leaks
- Customizing components using JQuery/EXT JS/JavaScript
- Enterprise Search development using ElasticSearch/FAST API
- Unit testing with Junit and Mockito Framework
- System design and implementation
- Securing applications with custom code or using Spring Security • Unix scripting and standalone application development
- Implementation of Batch processing and Scheduling events
- Automating Release/Deployment process
- Documentation and Deployment
- Rapid development in Agile methodology

**TOOLS AND TECHNOLOGIES**

- Java/J2EE
- RESTful/SOAP Web Services
- JSP/Servlets/JSTL/Portlets
- Unix Shell scripting
- Maven/Ant/Groovy
- JIRA/Bugzilla/Confluence
- EMC Documentum
- Spring 4.x/Struts 2.x
- MySQL/PostgreSQL/Oracle
- HTML5/CSS3
- Eclipse/IntelliJ/MAT
- Log4J/SLF4j/Liquibase
- JSON/XSD/XML/XPATH
- Sonar/BlackDuck/ERA
- EhCache/Redis Cache
- Hibernate/MyBatis
- ElasticSearch/FAST
- JavaScript/JQuery/EXTJs
- Tomcat/JBoss/Weblogic
- Jenkins/CruiseControl
- JavaMelody/JMeter
- CVS/SVN/GIT/BitBucket

**RELEVANT ENGAGEMENTS**

**Government Services – Medicaid, Accuity Asset Verification Services****Software Engineer III****Responsibilities:**

- Understanding and analyzing existing architecture of the system and implement features in existing application based on requirement documents & JIRA stories.
- Develop Spring Web MVC applications, SOAP/REST Services, Mock unit tests, modify the liquibase database scripts.
- Identifying the reusable code and refactoring codebase.
- Develop prototypes and frameworks to contribute to overall technical solution.
- Conduct unit and integration testing, including development of test models.
- Perform code refactoring, Review code and implement the suggested code changes based on code review done by other peers.
- Unit testing development and provide manual or automated testing before delivery to QA.
- UI development specified as per business rules.
- Defect fixing issues that are reported by QA for the software.
- Collaborate with team members to present best outcome.
- Manage, and tune platforms to ensure expected availability and performance levels are achieved.

**Standard and Poor's - DocShare Rating Services****Senior Consultant - Technology****Responsibilities:**

- Analysis of the existing architecture of the system and propose a new design for improving the performance, maintainability and scalability of the application.
- Conduct systems/requirement analysis in conjunction with Project Manager and Architect.
- Implement Spring-WS SOAP and REST Services, Mock unit tests, setup Dev and SI build environments, SSO and SST endpoints.
- Provide component level systems design and development.
- Develop prototypes and frameworks to contribute to overall technical solution.
- Lead onshore and/or offshore team to provide technical expertise to project
- Conduct unit and integration testing, including development of test models.
- Review code and provide inputs and setup configuration management.
- Unit testing development and provide manual or automated testing of software before delivery to QA. • Defect fixing and code refactoring reported by QA for the software.
- Manage, and tune platforms to ensure expected availability and performance levels are achieved.
- UI development with business rules that are derived from desktop client.
- • Collaborate with team members and client to present best outcome



**Accuity Testing Lead: Srinivasa Pothukuchi**

Quality Assurance Engineer

Accuity Asset Verification Services, Inc.

- ◇ Designs and develops test procedures and cases, with associated test data, based upon functional and nonfunctional requirements;
- ◇ Follow the Software Test Life Cycle includes requirement study, design, test planning, execution and defect tracking;
- ◇ Technical leadership for the test program, including test approach;
- ◇ Create automated regression tests using selenium;
- ◇ Ensures solution meets functional, performance, security, and scalability requirements;
- ◇ Responsible for security testing of the application;
- ◇ Works with team members to resolve technical problems.

**RELEVANT PROJECT EXPERIENCE****Client:** Social Security Administration**Project:** Access to Financial Institutions (2001 to present)

Description of Role: Quality Assurance Engineer

Description of Project: Support the SSI program by using the Access to Financial Institutions (AFI) Program to verify accounts, account balances and interest income for applicants, recipients and/or demors.

**Client:** Florida Department of Children and Families**Project:** Asset Verification System (2/2012 to present)

Description of Role: Quality Assurance Engineer

Description of Project: Purchasing the operation of an electronic solution for the asset verification system to detect assets held by financial institutions of aged, blind or disabled Medicaid applicants and recipients.

**Client:** Maryland Department of Human Resources (Subcontract with Autogov.com)**Project:** AVS Project (11/2011 to 8/2014)

Description of Role: Quality Assurance Engineer

Description of Project: Implementation of an asset verification system

**Client:** New Hampshire Department of Health and Human Services**Project:** Enrollment Data Services Analysis Project (11/2011 to 10/2014))

Description of Role: Quality Assurance Engineer

Description of Project: Establishment of an eligibility portal including asset verification data to assist staff in eligibility determination

**Client:** North Carolina Department of Health and Human Services**Project:** Asset Verification Services Project (2/2013 to present)

Description of Role: Quality Assurance Engineer

Description of Project: Web-based asset verification services

**Client:** New York Department of Health**Project:** Asset Verification and Real Property Resource Verification Project (10/2013 to present)

Description of Role: Quality Assurance Engineer

Description of Project: Identifies assets and real property held at various financial institutions or by the applicant/recipient for selected Medicaid applicants and recipients.

**Client:** Westchester County, New York Department of Social Services**Project:** Asset Verification Project (11/2013 to present)

Description of Role: Quality Assurance Engineer  
Description of Project: Provision of ban clearance through an internet-based system

**Client:** Michigan Department of Technology, Management and Budget Procurement

Project: Asset Test Service Project (6/2013 to present)

Description of Role: Quality Assurance Engineer

Description of Project: Establishment of an electronic test system for asset verification

**Client:** Oklahoma Health Care Authority

Project: Asset Test Service Project (8/2014 to present)

Description of Role: Quality Assurance Engineer

Description of Project: Establishment of an electronic system for asset verification

**Client:** Virginia Department of Social Services

Project: Asset Verification Service (10/2015 to present)

Description of Role: Quality Assurance Engineer

Description of Project: Establishment of an electronic system for asset verification

**Client:** Arkansas Department of Human Services

Project: Asset Verification Services (8/2015 to present)

Description of Role: Quality Assurance Engineer

Description of Project: Establishment of an electronic system for asset verification

### PROFESSIONAL BACKGROUND

Accuity, Inc.	11/2011 to present
International Software Systems	01/2010 to 11/2011
NE Technologies India Pvt Ltd	03/2007 to 01/2010

### EDUCATION

Masters in Computer Applications from Nagarjuna University, 2006

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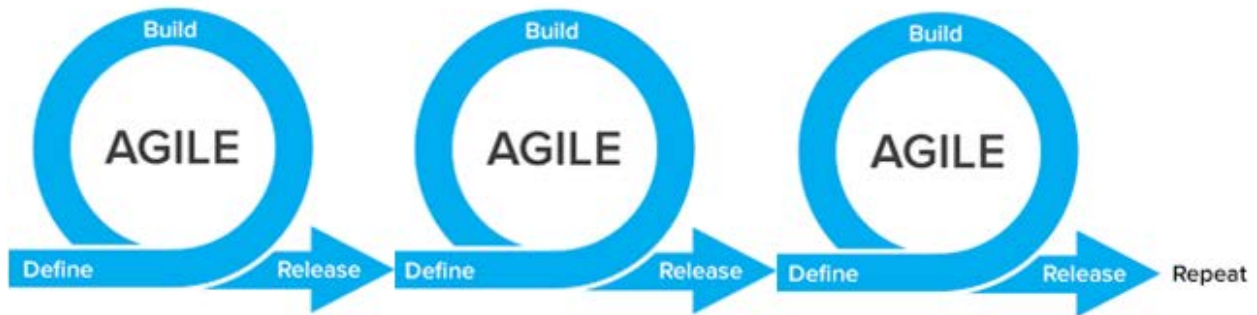
# 5. Project Management

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## 5. PROJECT MANAGEMENT

While PCG can be flexible in our approach to integration, either through your eligibility system or PCG's AVS Web Portal, PCG typically follows the Scrum-based Agile approach to software development. Agile is a time boxed, adaptive, iterative approach to software delivery that builds software incrementally from the start of the project, instead of trying to deliver it all at once at the end.



***PCG uses the Scrum-based Agile approach to software development, which follows an adaptive approach that continuously improves as well as refines expectations and requirements.***

Using Agile, PCG continuously creates and improves usable, testable chunks of code. The Agile process relies on a small group of stakeholders who meet daily to push forward on discrete chunks of work, each member of the group holding distinct and well-defined responsibilities.

Agile depends on an adaptive approach that continuously improves and refines expectations and requirements. Most requirements are defined at a high level in the initial stages of a project, and then refined over time as the project moves forward and more information is available. It allows for continuous adjustments and refinements during the application development process in response to feedback from team members and clients. The result is a more rapid delivery of usable software with a focus on providing continuous customer satisfaction.

Agile works by breaking projects down into little bits of user functionality called user stories, prioritizing them, and then continuously delivering them in short two-week cycles called sprints. Sprints are supported through daily scrums in which a small group of stakeholders meet to push forward a discrete chunk of work, with each PCG developer holding distinct and well-defined responsibilities. At the conclusion of each two-week sprint, PCG demonstrates completed functionality and obtains client sign-off based on previously agreed upon user acceptance criteria. By demonstrating our progress every two weeks, PCG ensures that progress is consistent and demonstrable and that any issues are identified and corrected early, rather than waiting for a surprise go live at the conclusion of the entire development process.

PCG's scrum-based implementations include the following critical work steps:

Scrum-Based Implementations	
Initiation and Planning	Requirements gathering, user story creation, user acceptance criteria definition, task prioritization, sprint scheduling and environment setup.
Execution	Sprint planning, coding, staging, testing, daily scrums, demonstrations, and sprint retrospectives.
Monitoring and Controlling	Bug and issue tracking, change management, and quality assurance

**Closing**

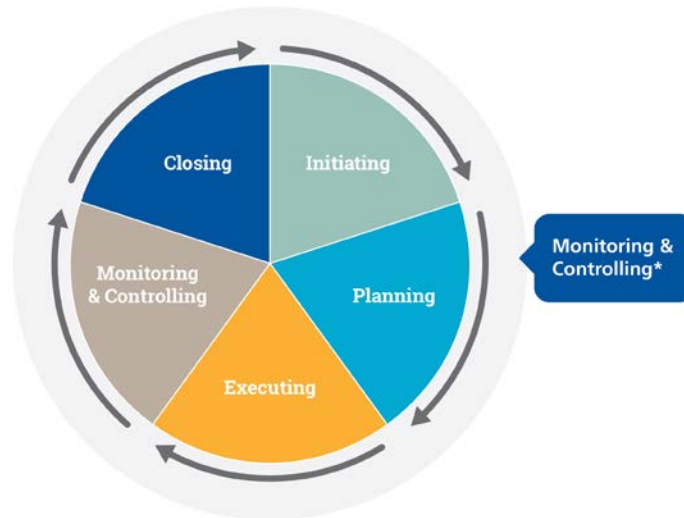
Production deployment and client sign-off

PCG typically develops on a Microsoft software platform in the Microsoft Visual Studio software development stack. PCG uses Team Foundation Server (TFS) to manage user stories and development tasks.

To ensure strong accountability controls and effective on-going operations with an emphasis smooth transitions, PCG maintains strong management practices and an administrative and staffing structure sufficient to meet our contractual responsibilities. PCG understands that asset verification projects involve many moving parts and sensitive timelines. PCG’s project manager will be assisted in their efforts by our Project Management Office (PMO) throughout the project life cycle. The PMO will work with assigned DHHR project managers and/or project leads as a third-party source of project management expertise and quality assurance, ensuring that Project Management Institute (PMI) standards are followed in all projects we complete. PCG abides by the project management processes and terminology laid out in the PMI’s *Project Management Body of Knowledge (PMBOK®) Guide*.

PCG manages individual projects through use of the PMBOK® Project Management Process, which defines the project life cycle in five phases: Initiating, Planning, Executing, Monitoring and Controlling, and Closing. PCG’s AVS Project Manager and our PMO will provide project management assistance to the DHHR project team during all five phases of the project life cycle.

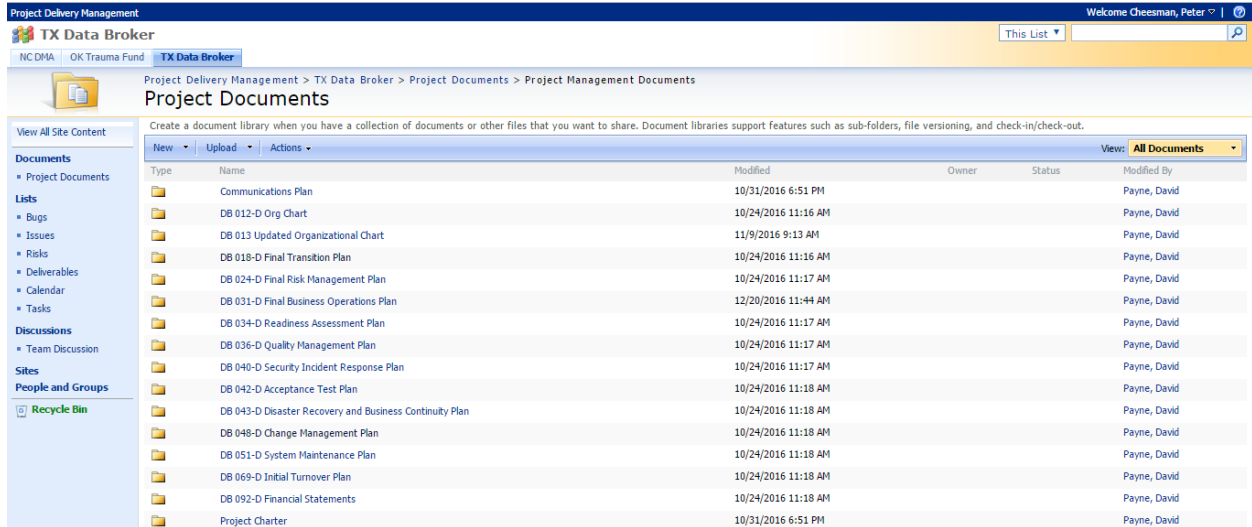
PCG will work closely with both DHHR and DHHR contractors to ensure a smooth and successful transition from the State’s existing AVS.



**PCG's Project Management Approach**

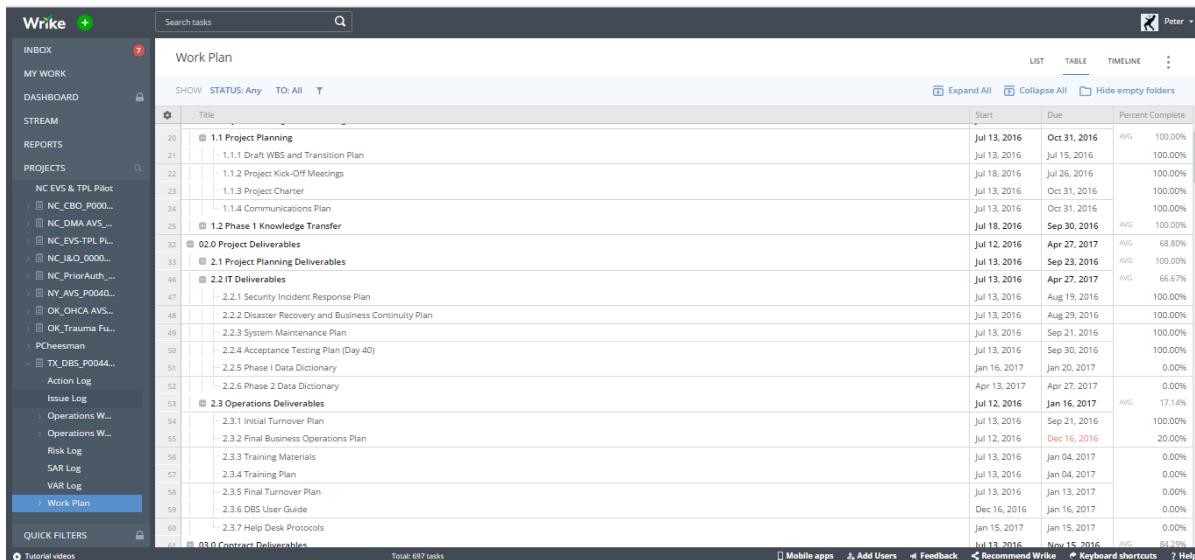
To accomplish the project’s objectives, the PCG Team will implement a project management approach that is tailored to the specific needs of DHHR. This project management approach will be used for all phases of the initiative and will apply to all of the deliverables submitted. PCG understands how essential project management is to the success of any project and will deploy a concentrated project management methodology to ensure information is communicated across all team members so that project deliverables remain on task and are accurately completed. The PMO assigned engagement lead will perform a needs assessment at the beginning of the project life cycle to determine the level of documentation needed to adequately address the project’s requirements, including all deliverables and artifacts required by the RFP.

Each PCG AVS project award results in the creation and maintenance of a SharePoint document repository which PCG uses to organize and store all project management artifacts. This ensures organization and appropriate version control throughout the project lifecycle while provide our AVS clients easy access to key project artifacts.



**SharePoint Project Management Document Repository**

In addition to our SharePoint document repository, PCG will also provide DHHR with access to our online project management software, Wrike, which will be used to track our progress against our project management plan.



**Wrike Project Management Software**

Upon contract award, PCG will set up a kick-off meeting with the State where we will present our project work plan, review DHHR preferences and requirements, establish weekly check-in calls, present our draft technical requirements, and identify appropriate DHHR resources for contract, project, and technical requirements management activities.

Prior to this kick-off meeting, PCG will submit a draft agenda and corresponding presentation materials for DHHR' review and approval.

PCG's approach to ensuring project stakeholders are engaged and informed throughout any AVS engagement is based on a simple premise: ensure the right people have the right information at the right time. During the planning phase of any AVS project, PCG completes the following Management Matrix with our clients. Adhering to this mutually agreed-upon matrix will ensure the right people have the right information at the right time.

	Agency Management	Agency Project Leads	Agency Technical Leads	Eligibility Operations Supervisors	Eligibility Operations Workers	PCG
<b>Project Communications</b>						
Monthly Summary Reports	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>
Ad Hoc Reports	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Change Orders	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input checked="" type="checkbox"/>
Weekly Implementation Status Dashboard Summary Report	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>
Project Work Plan		<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input checked="" type="checkbox"/>
Communications Plan		<input checked="" type="checkbox"/>	<input type="checkbox"/>			<input checked="" type="checkbox"/>
Risk Analysis & Mitigation Strategy		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
High Level Business Requirements		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Technical Requirements		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
User Stories		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
System Configuration Document		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Training Materials		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Operational Readiness Plan		<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>
Testing Verification and Acceptance Plan		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Weekly Status Reports		<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>
<b>Project Meetings</b>						
Project Kick-off Meeting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Weekly Check-ins		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Requirements Elicitation Sessions		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Daily Scrums						<input checked="" type="checkbox"/>
Bi-weekly Sprint Demos		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Joint Testing Sessions		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Trainings		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Pre-Go Live Product Demo	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>
Post-Go Live Onsite Support				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Web-based Tools</b>						

Shared Project Artifacts Library		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Online Project Management Software		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Team Foundation Server		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>

Because PCG has previously been engaged by 19 different states to implement and operate asset verification solutions and because PCG has the most experienced AVS project manager and team in the United States, we can ensure a meticulous and expeditious implementation while keeping all stakeholder groups informed, as appropriate, throughout.

Based on the completed Management Matrix, PCG will track and report on our progress to applicable stakeholder groups, as follows:

- ✓ **Shared Project Artifacts Library** - Each PCG AVS project award results in the creation and maintenance of a SharePoint document repository which PCG uses to organize and store all project management artifacts. This ensures organization and appropriate version control throughout the project lifecycle while providing our AVS clients on-demand access to key project artifacts.
- ✓ **Online Project Management Software** - PCG will also provide our agency clients with access to our online project management software, Wrike, which PCG uses to track our progress against our project management plan. This will allow the agency to monitor our progress without having to wait for a PCG update.
- ✓ **Microsoft’s Team Foundation Server** - PCG tracks and monitors all user stories, sprint plans, and technical issues/bugs within PCG’s Team Foundation Server (TFS) issue resolution software, which can be accessible to our agency clients. PCG’s delivery management and technical leads document all tasks and activities in this web-based software to allow for progress transparency between PCG’s technical team and business team, as well as any client stakeholder groups.
- ✓ **Weekly Status Report** – PCG will submit weekly status reports to the State which will detail our progress against our project work plan while identifying any changes, issues, and achievements.
- ✓ **Monthly Status Report** – PCG will submit monthly summary reports to the State which will detail our progress against our project work plan while identifying any changes, issues, and achievements.
- ✓ **Daily Scrums** – PCG will hold daily “scrum” meetings led by our delivery manager. These daily meetings allow PCG’s technical and business teams to quickly review the completion status of each assigned task/ticket within the biweekly sprint cycle.
- ✓ **Biweekly Sprint Demos** – PCG’s Agile approach to development requires us to demo the completion of each development sprint to our agency clients, who are required to approve the sprint before PCG can move on to the next set of development items. This ensures that the agency maintains demonstrated proof of PCG’s progress throughout our AVS implementations.
- ✓ **Ad Hoc Reports** – PCG agrees to provide ad hoc reports, upon request, to ensure any agency stakeholder groups are able to obtain on-demand access to any information that might not be found in the above-mentioned tools and reports.

PCG has summarized our AVS project work plan on the following pages. Because PCG has already successfully deployed our AVS in multiple states and has previously established interfaces Accuity and LexisNexis, PCG can offer the State of West Virginia a **low-risk, expedited** implementation plan.

**Project Planning Phase: Day 1 - 20**



During the Project Setup phase, the PCG Team will collaborate to establish the project infrastructure as a critical first step in ensuring the long-term success of the project. PCG will draft project management templates and artifacts, plan and execute the project kick-off meeting, and define project communications, system security, and the change control and approval process. Each of these artifacts will be submitted to the State for review and approval and will be available throughout the project at any time for review.

PCG will develop a series of critical documents during the Planning phase, including:

- ✓ **Communications Management Plan Draft:** PCG’s Communications Management Plan will identify each internal and external project stakeholder, what they need to know, and when. This Plan will also define our communications schedule, assign responsibilities for communications, and identify each stakeholder’s preferred means of receiving communications from PCG. Finally, PCG will define the State’ reporting requirements, the content of each report, and the timing of the delivery of each report.
- ✓ **Project Management Plan Draft:** PCG will draft a detailed project plan defining each activity, and all supporting activities, which need to take place in order to fulfill our contracted scope of work. This Plan will be updated daily to identify the expected and actual timing of our activities, the required resources for each activity, and to document the completion of each activity.
- ✓ **Implementation Work Breakdown Structure Draft:** PCG’s most important project artifact is our Implementation Work Breakdown Structure, which will serve as a detailed framework for illustrating the primary and secondary subdivision of 100% of the tasks and deliverables for the duration of the project.

PCG will also schedule a kick-off meeting with the State where we will present our project work plan, review DHHR preferences and requirements, establish weekly check-in calls, present our draft technical requirements, and identify appropriate DHHR resources for contract, project, and technical requirements management activities. Lastly, PCG will also schedule and execute a Development Kick-off Meeting to review technical considerations associated with the State’s AVS implementation.

Holding kick-off meeting and developing these key project artifacts will ensure that the State has a vendor who is able to examine project activities and requirements at a granular level which will both establish accountability and allow for the timely execution of tasks in accordance with project requirements.

Key Project Planning Phase Deliverables
Implementation Work Breakdown Structure
Communications Management Plan
Project Management Plan
Kick-off Meeting Minutes
Development Kick-off Meeting Minutes

During the Project Planning phase, PCG will also establish the project’s document repository and will migrate the work breakdown structure (WBS) to the web-based Wrike software to allow DHHR to monitor PCG progress in real time.

Finally, PCG will document our Project Management Infrastructure during this phase and will submit all corresponding templates to DHHR for review and approval.

Project Planning Phase Deliverables
Business Continuity and Disaster Recovery Plan
Financial Institution List
Risk Analysis and Mitigation Strategy
Report Templates
Staffing Management Plan
Documentation Management Plan

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Testing Management Plan
Scope Management Plan
Schedule Management Plan
Change Management Plan
Cost Management Plan
Human Resources Management Plan
Issue Management Plan
Stakeholder Management Plan
Data Retention Plan
Security Management Plan
Workflow Management Plan
Turnover Management Plan
Deliverable Dictionary
Data Conversion and Contingency Plan
Integration Management Plan
Data Dictionary

**Requirements Definition Phase: Day 20 - 40**

During the Requirements Definition phase, PCG will review define DHHR requirements and create user stories for review and approval. PCG will work with the State to define DHHR AVS Web Portal configuration requirements. PCG will also detail the process for establishing connectivity and transferring data. PCG also will collaborate with the State to map out the plan for establishing a bi-directional interface with West Virginia's eligibility system.

Additionally, PCG will work with the State during this phase to define the following:

- ✓ Batch and/or XSD File formatting;
- ✓ Connectivity requirements and credentialing;
- ✓ Data transmission method(s);
- ✓ Data transmission schedule;
- ✓ Integration requirements;
- ✓ Request and Response formatting;
- ✓ Error messaging;
- ✓ SFTP setup and credentialing.
- ✓ Benefit program, category, and household size variations and the configuration of each against applicable program limits and eligibility requirements;
- ✓ Look-back period configuration;
- ✓ Decision Support Configuration;
- ✓ Definition of countable and non-countable assets;
- ✓ Error messaging;
- ✓ Duplicate case submission logic;
- ✓ Renewal case submission and existing case replacement logic;
- ✓ Spouse matching configuration;
- ✓ Case resolution and eligibility decision reconciliation;

- ✓ User roles and access restrictions;
- ✓ Credentialing.
- ✓ Testing and validation; and
- ✓ User acceptance testing support and mock services.

Requirements Definition Deliverables
High Level Business Requirements
Technical Requirements
User Stories
Monthly Report Template

***AVS Web Portal Implementation: Day 40 - 70***

Because PCG has established AVS programs and interfaces around the United States, PCG can implement the State’s AVS in 30 days. During the AVS Web Portal Implementation phase, PCG will work with DHHR to configure our AVS Web Portal to reflect State-specific eligibility policy.

The PCG Team will work with you during this phase to accomplish the following tasks:

- ✓ Finalize agency batch/web services profile;
- ✓ Establish connectivity;
- ✓ Validate firewalls, connectivity, and encryption;
- ✓ Implement connectivity;
- ✓ Messaging implementation;
- ✓ Agency application development process;
- ✓ PCG Testing;
- ✓ User Acceptance Testing;
- ✓ User training; and
- ✓ Production deployment.

PCG will also perform end-to-end testing of our AVS Web Portal prior to DHHR user acceptance testing. To support DHHR UAT, PCG will provide a dedicated UAT environment, will work with DHHR to identify mock scenarios and to create test cases, and will resolve any bugs identified.

PCG also will work with DHHR to define training requirements, create training materials, and to execute a series of onsite and remote training sessions to ensure DHHR staff are prepared for live use of the AVS service. PCG will provide a team of project staff dedicated to training your staff, upon request, on the AVS prior to, and after, going live. PCG will customize our trainings for specific audiences and will perform the trainings either in-person or via WebEx.

Finally, during the Development phase, PCG will also facilitate go live meetings and provide DHHR with a continually-updated Go Live Dashboard.

Development Phase Deliverables
Go Live Dashboard
Test Plan
AVS User Guide
Frequently Asked Questions

## AVS Support Guide

## Training Materials

***AVS Web Portal Operations Phase: Day 70 – Day 160***

At the conclusion of the statewide implementation, PCG will initiate our ongoing AVS operations. PCG will support these operations by providing dedicated support staff who will be available via a dedicated, toll-free phone number and email address to provide technical, customer support, and financial institution support for AVS users. This service will be available during normal business hours for the duration of this engagement.

PCG will also deliver regularly scheduled and ad hoc reporting, as requested by the State, throughout this engagement, including weekly and monthly status reports.

***AVS Services Interface Requirements Definition: Day 70 – Day 90***

At the conclusion of the statewide AVS Web Portal implementation, PCG will initiate requirements planning for integrating our AVS directly into the State's eligibility system.

The PCG Team will work with DHHR during this phase to define the following requirements:

- ✓ Batch or XML formatting;
- ✓ Connectivity and encryption;
- ✓ SFTP transmission and credentials;
- ✓ Request and response scheduling;
- ✓ Error messaging;
- ✓ Technical requirements;
- ✓ User stories; and
- ✓ Sprint plan.

***AVS Services Interface Integration: Day 90 – Day 130***

PCG will work with DHHR to integrate our AVS directly into the State's eligibility system via XML and/or batch file exchanges.

The PCG Team will work with DHHR during this phase to complete the following tasks:

- ✓ Establish and validate connectivity;
- ✓ Firewalls and encryption validation;
- ✓ Request and response messaging and error handling;
- ✓ Web service development;
- ✓ Support DHHR modifications to your eligibility system to request and display AVS data;
- ✓ Request and response implementation;
- ✓ Error handling and messaging implementation;
- ✓ Joint testing meeting;
- ✓ Test planning;
- ✓ Coding and unit testing;
- ✓ SIT scenario definition;

- ✓ SIT testing;
- ✓ UAT testing; and
- ✓ Training.

**AVS Services Interface Operations Phase: Day 130 - Forward**

PCG will transition our AVS production from the AVS Web Portal to the direct integration with the State’s eligibility system. PCG will continue our ongoing AVS operations, including supporting these operations by providing dedicated support staff who will be available via a dedicated, toll-free phone number and email address to provide technical, customer support, and financial institution support for AVS users. This service will be available during normal business hours for the duration of this engagement.

PCG will also deliver regularly scheduled and ad hoc reporting, as requested by the State, throughout the operations phase, including weekly and monthly status reports.

**5.1 Quality Management**

PCG’s approach to quality management is cumulative and ongoing and involves: (1) quality definition; (2) quality measurement; (3) quality assurance; (4) quality improvement; and (5) quality reporting.

- **Quality Definition:** How is quality defined?
- **Quality Measurement:** How are we measuring quality?
- **Quality Assurance:** What steps are we taking to ensure quality?
- **Quality Improvement:** What steps are taken to ensure continuous quality improvement?
- **Quality Reporting:** How are we communicating quality results to DHHR?

What follows are PCG’s Asset Verification Services quality expectations and our approach for meeting each expectation:

Item	Quality Definition	Quality Measurement	Quality Assurance	Quality Improvement	Quality Reporting
<b>Deliverable Submissions</b>	Internal approval	Approved by project manager	Reviewed at least 3 days prior to due date	Rectify any reported quality issues	Updated project management work plan
	On-time delivery	Submitted by due date	Ready to submit 24 hours prior to due date	Prepare earlier	
	DHHR acceptance	Acceptance received	Internal review process	Incorporate DHHR feedback into future deliverables	Weekly and Monthly Reports
<b>Implementation Activities</b>	Internal testing passage	DHHR sign-off on implementation	Fully defined requirements and user stories signed	Rectify any reported quality issues	Updated implementation work plan

Item	Quality Definition	Quality Measurement	Quality Assurance	Quality Improvement	Quality Reporting
		milestones	off on by DHHR		
	On-Time Completion	Submitted by due date	Ongoing project management monitoring of WBS and delivery management monitoring of bugs and/or issues	Add resources to ensure timely completion	Weekly and Monthly Reports
	DHHR Acceptance	Acceptance received	Regular demonstrations and close coordination of issue resolutions with DHHR	Incorporate DHHR feedback into future activities	
<b>Financial Institution Participation</b>	FIs contacted and informed of pending WI AVS	85% national participation levels or better	FI contact logging and weekly reviews, FI follow-up contacts	Additional and/or more frequent FI contacts when/if necessary	Weekly and Monthly Reports
	FIs supported	Live FI help desk uptime	Proactive alerts to identify help desk outage and/or higher than usual call volumes	Additional system monitoring	
		Prompt issue resolution	Issue resolution tracking	Additional help desk staff	
<b>Information Security</b>	No security incidents	Number of security incidents = 0	<ol style="list-style-type: none"> <li>1. Protect data at rest</li> <li>2. Protect data in transit</li> <li>3. Monitor and log access to both physical and digital data</li> <li>4. Terminate user accounts within 24 hours</li> <li>5. Perform quarterly penetration tests</li> <li>6. Regularly perform security scans</li> <li>7. Perform system maintenance,</li> </ol>	Incorporate results of all pen tests, scans, and security test activities into ongoing security features.	Weekly and Monthly Report

Item	Quality Definition	Quality Measurement	Quality Assurance	Quality Improvement	Quality Reporting
			patches, and updates as necessary 8. Track and report any suspicious and/or unauthorized access to data		
<b>System Uptime</b>	99.5% availability	"On" hours system availability	1. PCG IT will schedule all system maintenance during off hours 2. PCG will notify DHHR of all scheduled system maintenance at least 48 hours in advance 3. System availability times are tracked by PCG IT on a weekly basis and reported to Project Manager 4. Project manager identifies any availability issues 5. Project Manager and PCG IT work to resolve any issues 6. Project Manager coordinates any ongoing issues with DHHR, as necessary	Diagnose success/failure of system maintenance scheduling and adjust protocol accordingly	Monthly Report
<b>System Outage Reporting</b>	Major system outage reported informally within 5	Time to report informally and formally	1. Incidents logged 2. Project Manager alerted by phone and email immediately	Diagnose success/failure of outage reporting and adjust protocol	Weekly and Monthly Report

Item	Quality Definition	Quality Measurement	Quality Assurance	Quality Improvement	Quality Reporting
	minutes and formally within 24 hours		3. Incidents reported to DHHR by Project Manager	accordingly	
<b>AVS User Account Termination</b>	24 hours	Time from receipt of termination requests to termination	<ol style="list-style-type: none"> <li>1. User termination times are tracked by PCG IT on a weekly basis and reported to Project Manager</li> <li>2. Project manager identifies any availability issues</li> <li>3. Project Manager works to resolve any issues</li> <li>4. Project Manager coordinates any ongoing issues with DHHR, as necessary</li> </ol>	Diagnose success/failure of user termination and adjust protocol accordingly	Monthly Report
<b>Ad Hoc DHHR Request Fulfillment</b>	<ul style="list-style-type: none"> <li>▪ On-Time Delivery</li> <li>▪ DHHR acceptance</li> </ul>	Approval by Project Manager and DHHR. Delivered on time.	<ol style="list-style-type: none"> <li>1. Request Logged</li> <li>2. Completed by Associate Project Manager 24 hours prior to due date</li> <li>3. Final Review by Project Manager</li> </ol>	Rectify any reported quality issues. Incorporate internal and/or DHHR feedback into future ad hoc request fulfillments	Monthly Report
<b>Issue Resolution Timing</b>	Issues resolved within quoted timeframe	Date/time issue was reported to issue resolution date/time	<ol style="list-style-type: none"> <li>1. Adequately staff IT professionals to support issue resolution</li> <li>2. Prioritize “hot fixes” and critical issues</li> <li>3. Accurately communicate estimated completion timeframes</li> <li>4. Track and</li> </ol>	Evaluate results and Implement contingencies, as necessary	Monthly Report



Item	Quality Definition	Quality Measurement	Quality Assurance	Quality Improvement	Quality Reporting
			document compliance with estimates		
<b>Accuity AVS Response Times</b>	Average of <three days	Days between request date and response date	<ol style="list-style-type: none"> <li>1. Monitor response times by financial institution</li> <li>2. Contact slow-responding FIs</li> <li>3. Recruit slow-responding FIs into automated response service</li> </ol>	Ongoing FI support, communication and education	Monthly Report
<b>Over Resources Discovery</b>	5% over resources	Discovered current account balances vs. resource limit	<ol style="list-style-type: none"> <li>1. Monitor responses by financial institution</li> <li>2. Contact non-responding FIs</li> <li>3. Recruit non-responding FIs into AVS</li> </ol>	Ongoing FI support, communication and education	Monthly Report

On a weekly and/or monthly basis, PCG will report on each of the performance measures detailed in the table above.

Another way PCG ensures the quality of our AVS is by performing extensive end-to-end testing prior to deployment. The following table lists and describes the roles involved in PCG’s testing process.

Role	Test
Developer	The primary responsibilities are as follows: <ul style="list-style-type: none"> <li>✓ Develop the system/application</li> <li>✓ Assist in developing Use Cases and testing requirements in collaboration with the business team</li> <li>✓ Conduct unit testing</li> <li>✓ Support business team with user acceptance testing</li> </ul>

Role	Test
PCG IT/ITS Test Team	The primary responsibilities are as follows: <ul style="list-style-type: none"> <li>✓ Prepare Test Plan</li> <li>✓ Manage setting up testing environment and testing data.</li> <li>✓ Monitor and manage testing integrity and support testing activities</li> <li>✓ Coordinate activities across all developers and business team</li> <li>✓ Develop test cases and testing requirements in collaboration with the developer</li> <li>✓ Prepare test case and test scenarios in coordination with the developer and the business owner</li> <li>✓ Execute test cases and test scripts</li> <li>✓ Conduct Integration, System and Sanity testing</li> <li>✓ Conduct Regression testing</li> <li>✓ Manage bug tracking and generating bug reports</li> </ul>
Business Test Team	The primary responsibilities are as follows: <ul style="list-style-type: none"> <li>✓ Monitor and manage testing integrity and support testing activities</li> <li>✓ Coordinate activities across all developers, business team, business owner, and operational team</li> <li>✓ Develop test cases and testing requirements in collaboration with the Developer</li> <li>✓ Execute test cases</li> <li>✓ Conduct User Acceptance Testing</li> <li>✓ Conduct retesting</li> <li>✓ Creating new logic for any change request that impacts previous business rules</li> </ul>
DHHR IT	The primary responsibility is DHHR's IT Test Plan

What follows are PCG's key testing team members and their overall responsibilities as it relates to testing.

Role	Individual	Responsibilities
Delivery Manager	Brett Tervalon	<ul style="list-style-type: none"> <li>✓ Successfully implementation of the project</li> <li>✓ Timely delivery of project</li> </ul>
Project Manager	Peter Cheesman	<ul style="list-style-type: none"> <li>✓ Ensure the successful delivery of the project at all stages</li> </ul>
QA Manager	Ronak Khatri	<ul style="list-style-type: none"> <li>✓ Responsible for ensuring the complete and timely testing of all modules</li> <li>✓ Completing bug estimate and evaluation</li> <li>✓ Managing and supporting QA Testers</li> </ul>
Architect	Adam Knowlton	<ul style="list-style-type: none"> <li>✓ Responsible for ensuring the accurate and timely development of all modules</li> </ul>
UAT	DHHR	<ul style="list-style-type: none"> <li>✓ Configuration files</li> <li>✓ User Acceptance Testing</li> </ul>
Release Manager	Brett Tervalon	<ul style="list-style-type: none"> <li>✓ Responsible for software release from development stage to software release</li> </ul>

*Entry and Exit Criteria*

This section describes PCG's criteria that determines when testing should begin and when it should end.

- ✓ Test Plan is approved.

- ✓ Test Environment has been set up with infrastructure in place to support fail over and recovery.
- ✓ Proper access has been granted to all testing resources for the environments being utilized for the testing effort.
- ✓ Test resources are available.
- ✓ Test data has been created.
- ✓ Unit testing of modules has been done.
- ✓ Code is deployed to appropriate tier.
- ✓ Open/Known issues shared with the testing team.
- ✓ Test cases have been created.
- ✓ True Foundation Server (TFS) is available and ready for use.
- ✓ All required test harnesses/tools are ready.

The following is a list of PCG’s criteria used to determine when acceptance test will end:

- ✓ All designated Test Cases have been executed.
- ✓ Positive and Negative test cases have been done for each Test Step.
- ✓ All bugs identified are logged in TFS.
- ✓ All Severity 1, 2 and 3 bugs are resolved, tested and signed-off.
- ✓ All Severity 4 bugs not closed will be reviewed by the Product Owner, and any other relevant staff, for severity to determine whether to defer to backlog or fix in current release.

*Testing Suspension and Resumption Criteria*

This section defines PCG’s criteria that will determine if testing should be suspending or resumed.

- ✓ If any Fatal/Critical priority defects are identified in any application module which causes the testing to halt in that module. Testing will continue in other application modules if possible while the fatal defect is being corrected.
- ✓ The pre-defined level of test objectives and goals are not met.
- ✓ Critical scope change that affects the project continuance.
- ✓ Requirements or Business priorities are changed.
- ✓ Testing will not be suspended for minor or cosmetic defects; however, if business team or Project Manager determines that the number of minor issues are too high then they can suspend the testing.

PCG relies on the following criteria determine when testing should be resumed after it has been suspended:

- ✓ The defects are fixed and deployed in the testing environment.
- ✓ Development fix helps reach the pre-defined level of the test objectives and goals.
- ✓ If the change requirements are ready to test.
- ✓ If the scope or business priority changes are deployed in the testing environment.

The following table lists and describes the types of tests PCG performs when implementing AVS.

Test Type	Description
Component	Verifies the functionality of a specific section of code at the functional level as per requirements. It successfully processes inputs, produces outputs, and detects errors and exceptions in processing. This testing is done by developers on the code they worked.
Functional	Tests the applications as per the requirements which are defined for each user story for different sprints.
Usability	Tests the UI of the application like menu, buttons, data populating in text fields and drop downs with correct information, contents are clear and easily readable.
Interface	Checks that all the interactions between servers are executed properly.

Test Type	Description
Database Integrity	Verifies that the data is being stored by the system in a manner where the data is not compromised by updating, restoration, or retrieval processing.
Security	Ensures that users are assigned to appropriate roles based on user's requirements.
Smoke	Exposes any major problems by validating that the critical application functionality works as defined after every build.
Regression	Verifies that application functionality is working the same as before the code changes were made.
Parallel	Ensures that the processing of new application (new version) is consistent with respect to the processing of previous application version.

The following table lists and describes PCG's testing stages through which code changes progress.

Sequence	Test Stage	Description
0	Input file and API	Ensures the integrity of file received from external sources.
1	Unit	Executed by developers to make sure that the component that has been coded is working as expected before passing to testing team.
2	System Integration	Multiple modules are combined in the integrated system to test system level functionality, including: <ul style="list-style-type: none"> <li>• Navigational flow</li> <li>• Data functionality</li> <li>• Business functionality</li> </ul> Testing also confirms that the system meets its requirements, and tests the integration of individual work products across all project teams, modules, and interfaces. It also includes the Web-services testing and database testing.
3	Performance	Tests the general throughput and response time for the application in a full-volume environment with the maximum number of users.
4	End-to-end	Tests the flow of the complete application to ensure that it is performing as designed from start to finish. It is the testing of complete application environment such as interacting with database, interacting with other hardware, applications or systems. The purpose of carrying out end-to-end tests is to identify system dependencies and to ensure that the right information is passed between various components and systems
5	User Acceptance	The system is made available to a designated number of business users to verify detailed functionality, and to check that all the requirements have been met.
6	Production	The final opportunity to determine if the software is ready to release. Its purpose is to simulate the production cutover as closely as possible and, for a period of time, simulate real business activity.

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PCG uses the following test matrix to record the completion of specific tests in relation to specific stages during each sprint, as necessary.

	Unit	Sanity	Integration	System	Performance	End to End	UAT	Production
Component Testing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Functional Testing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Usability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Interface	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Database Integrity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compatibility	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Security	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Smoke	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regression	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parallel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Load	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Stress	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cookies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Test Management**

All the test results and bugs will be documented against the test cases and stored in TFS. DHHR will have access to PCG’s TFS to allow for real-time monitoring of PCG’s testing efforts. Every bug entered into TFS is associated with a Test Case Task and corresponding User Story. The bugs are fixed by the developer based on the severity and priority of the defect. A Bug Estimation report is generated after every Sprint by HSD QA.

**Bug Reporting**

The Bug Reporting policy and procedure has following objectives:

- ✓ Streamline proper channel of communication for addressing the bug
- ✓ Help streamline change request process
- ✓ Prioritizing and assigning bugs appropriately
- ✓ Communicating the complexity to complete the ‘fix’ through proper channel

When a bug is identified during testing an entry is created in TFS with status of “New,” the Progress Level as “In Queue” and it is assigned to the developer. After the issue is resolved, it is assigned back to the Testing team who runs a regression test. Following successful passage, the issue is closed by the Testing team.

The Bug Progress report is generated out of TFS in Excel, and graphical format after every regular build in testing life cycle and the overall Bug Tracking report is generated at the end of every Sprint.

PCG uses Bug Priority fields to establish the order in which a bug should be resolved. The priority status is set by the Tester to help the Developer determine the time frame to fix the bug, as dictated by business needs and requirements. Bug Priority levels are defined as outlined in the following table.

Priority	Level	Description
1	Production Blocker	The bug must be fixed immediately. It is affecting the application severely. The system cannot be used until the fix has been completed.
2	High	Major system component unusable due to failure or incorrect functionality. Need to fix as soon as possible.
3	Medium	Incorrect functionality of component or process, workaround available.
4	Low	Cosmetic or other non-functional defect. It is not an important issue at this time, and does not require immediate action. The bug is fixed after all higher priority bugs are fixed.

Because PCG is currently engaged by 19 health and human services agencies to provide AVS, we are well positioned to provide DHHR with an expeditious implementation, including the completion of all required testing.

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## 6. Support for Multiple Programs

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## 6. SUPPORT FOR MULTIPLE PROGRAMS

A key differentiator between PCG and our competitors, is that PCG is not only the national leader in asset verification services, we are also the national leader in eligibility verification data broker services. As the Data Broker for the Texas Health and Human Services Commission, PCG provides not only asset verification services, we also provide the State with access to nearly 50 additional federal, state and commercial eligibility verification data sources and corresponding analytics. Because PCG has already established these interfaces, we can quickly and cost-effectively update our asset verification service in the State of West Virginia to provide one or more of these additional data sources as an add-on to our asset verification service. Additionally, PCG can support additional programs within the State of West Virginia by providing our asset verification service to these additional agencies.

Because PCG is data vendor-neutral, we are able to offer the most comprehensive menu of identity and eligibility verification data sources from competing commercial vendors in a single solution which our agency clients can use to more accurately verify eligibility, detect fraud and expedite eligibility determinations. PCG uses this data to verify all of the following applicant/beneficiary identity and eligibility criteria:

PCG's Optional Eligibility Verification Measures
Fraud, identity, credit history, citizenship, death, incarceration, credit; and criminal record
Changes in household composition, undisclosed earners at address, caretaker relative age, marriage, divorce, dependents, and death
In-state residency and out-of-state benefits eligibility
Countable income, unearned income, self-employment income, and undisclosed income sources
Countable assets, undisclosed bank accounts, significant account balance decreases
Countable property, undisclosed property, and disqualifying asset transfers

PCG's data and analytics services are designed to be completely configurable and scalable to allow our clients to not only easily add new verification data sources (e.g. identity, property, income, residency, household composition, etc.), but also to quickly incorporate additional or changing business rules and/or flags reflecting new data requirements and/or changing program limits. If the State is investing in an asset or eligibility verification data solution, it makes sense that this solution should be able to be easily scaled to include additional data sources, accommodate new business rules and risk scoring, and to be quickly configurable to account for changing program limits and/or federal requirements. Further, if the State is looking up cases one-by-one to access any data source, PCG can incorporate the data source into our service to automate the retrieval of the data by State workers, saving both time and money.

Data sources currently being used by PCG on behalf of other state health and human services agencies to enhance their identity and eligibility verification capabilities and which can be integrated into PCG's AVS include those listed in the chart below. PCG has invested significant time in the creation of interfaces with each of these data sources and can leverage this effort to provide agency clients with cost-effective and expeditious access to one or more sources. PCG's automated identity and eligibility verification solutions can eliminate the need for your staff to manually review this data by linking any of our services to any of these data sources and applying corresponding eligibility verification measures and analytics to the results.

Source	Use Case
LexisNexis Real Property	PCG uses this data to identify owned and previously-owned properties/real estate to identify potentially disqualifying asset transfers and more accurately determine resource-based eligibility. PCG also uses this data to identify owned automobiles, airplanes, RVs, and watercraft whose ownership may potentially impact resource-based eligibility.



Source	Use Case
Equifax The Work Number	PCG uses this data verify current income levels and to identify both disclosed and undisclosed current and previous employers.
Experian Credit History	PCG uses this data to verify credit histories, identities, spending patterns, employers, address, and income irregularities.
LexisNexis Instant Verify	PCG uses this data to verify that the identity of an applicant exists and is legitimate and to uncover indicators of potential fraud.
Experian Income Insight W2	PCG uses this tri-bureau-capable income estimation model to calculate real-time income estimates, verify self-employment claims, and to identify potential omissions in the income reported by applicants.
Experian Fraud Shield	PCG uses this data to screen for more than 30 high-risk profiles and provide a detailed series of identity checks to uncover inconsistencies and fraud.
LexisNexis Residency	PCG uses this data to identify applicants and beneficiaries currently residing out-of-state.
LexisNexis ID Authentication	PCG uses this knowledge-based authentication service to verify identities upon login to benefits application websites.
LexisNexis Incarceration	PCG uses this data to identify incarcerated applicants and beneficiaries.
LexisNexis Undisclosed Earner	PCG uses this data to verify the number of adult earners living at specific addresses.
National Auto Research (NAR) Vehicle Values	PCG uses this data to identify the value of owned motor vehicles.
Systematic Alien Verification for Entitlements (SAVE)	PCG uses this citizenship data used to verify alien status.
Social Security Administration (SSA) Death Master file	PCG uses this data to verify the deceased status of applicants and household members.
IRS DIFSLA	PCG uses this IRS unearned income data to identify unearned income (e.g. SSI, pensions, unemployment compensation, etc.) reported on non-W4 forms.
SSA BEERS	PCG uses this annual earnings, pension, and self-employment data to identify undisclosed income received by individuals on TANF or Medicaid
SSA Prisoner Update Processing System	PCG uses this data to identify incarcerated applicants and beneficiaries potentially disqualifying them for benefits.
EBT / Out of State Shopping	PCG uses this SNAP and TANF benefit spending data to identify out-of-state benefit spending.
National Directory of New Hires (NDNH)	PCG uses this new hire data to identify employment and its impact, if any, on SNAP benefits.

Source	Use Case
Food and Nutrition Services (FNS) SNAP eDRS	PCG uses this SNAP verification data to identify previously disqualified SNAP clients.
Sex Offender Registry Data	PCG uses this data to verify sex offender status of applicants and beneficiaries.
PARIS Interstate Match File	PCG uses this data to identify applicants and beneficiaries receiving Medicaid, TANF, Food Stamps, Child Care, Worker's Compensation, and/or General Assistance in other states.
State Quarterly Wage Files	PCG uses this data to confirm reported income levels.
State Child Support Data	PCG uses this data to identify undisclosed income, expenses, and household compositions.
State Unemployment Data	PCG uses this unemployment insurance data used to identify undisclosed income and to verify unemployment status.
State Criminal History Data	PCG uses this data to identify criminal histories, incarceration status, probation status, and felony convictions.
State Driver's License Information	PCG uses this driver's license and ID card information to verify identity and residency.
State DMV Information	PCG uses this data used to verify vehicle ownership.
State Lottery Commission	PCG uses this lottery winnings data to identify undisclosed income.
State Vital Statistics Data	PCG uses this marriage, divorce, and death data to verify household composition and dependent statuses.
State Employee Retirement System Data	PCG uses this data to identify undisclosed retiree income (e.g. supplemental payment, cost-of-living increases, adjustments, etc.)
State Teacher's Retirement System Data	PCG uses this data to verify retiree gross and net income.
County Property Records	PCG uses this data used to verify residency and property ownerships.
Other	PCG can integrate any data source, whether it is available through flat file, individual look-ups, web services, or batch transmissions, into our asset and eligibility verification services and web applications.

In addition to efficiently integrating additional data into our asset and eligibility verification services, PCG also offers a proprietary predictive analytics solution which includes hundreds of data matches and comparisons across all applicable data sources, State records, and applicant attestations to quantify the level of risk associated with each application and renewal, the area of risk, and the resulting consequences for eligibility determinations, next steps, and case assignments. Additional information on PCG's data broker and analytics services is available upon request.

No other vendor can offer the DHHR an asset verification solution that is as easily scalable to include additional functionality while allowing DHHR to leverage this additional functionality to ensure applicability and usefulness with other programs.

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## 7. Future AVS Services Licensing

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## **7. FUTURE AVS SERVICES LICENSING**

PCG agrees to accommodate an unlimited number of DHHR users of our AVS Web Portal for as long as the State utilizes the Portal for AVS.

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## 8. Appendices

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- Appendix 1 Accuity Regional Financial Institution Network
- Appendix 2. Pdf Summary Report
- Appendix 3. Terms and Conditions
- Appendix 4. Purchasing Affidavit



## **8. APPENDICES**

PCG has included the following appendices to this proposal:

- ✓ Appendix 1: Accuity Regional Financial Institution Network
- ✓ Appendix 2: PDF Summary Report
- ✓ Appendix 3: Terms and Conditions
- ✓ Appendix 4: Purchasing Affidavit

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## Appendix 1: Accuity Regional Financial Institution Network

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INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
10080140	Wells Fargo Bank, National Association	5,789	608	0	259	1	81	267	0
10384120	JPMorgan Chase Bank, National Association	5,216	471	26	1	358	0	0	86
10077420	Bank of America, National Association	4,624	354	0	64	0	158	132	0
10433000	U.S. Bank National Association	3,111	424	0	0	288	0	0	136
10349180	PNC Bank, National Association	2,651	1,180	1	432	347	195	86	119
10423360	Branch Banking and Trust Company	2,188	970	68	294	2	156	339	111
10128280	SunTrust Bank	1,493	335	7	0	0	121	207	0
10006040	Regions Bank	1,450	10	0	0	0	0	0	10
10433400	KeyBank National Association	1,348	337	0	118	219	0	0	0
10446200	Fifth Third Bank	1,306	483	8	2	372	0	0	101
10237460	TD Bank, National Association	1,240	134	0	95	0	18	21	0
98171752	Citizens Bank, National Association	794	98	0	0	98	0	0	0
10364760	Manufacturers and Traders Trust Company	777	360	2	165	0	165	28	0
10433900	The Huntington National Bank	744	482	30	51	388	0	0	13
10384700	Citibank, N.A.	711	16	0	0	0	10	6	0
30044100	Santander Bank, National Association	679	160	0	160	0	0	0	0
10230340	Capital One, National Association	677	143	0	0	0	83	60	0
10551397	Woodforest National Bank	639	188	7	32	70	7	47	25
10419040	First-Citizens Bank & Trust Company	524	51	4	2	0	1	44	0
10482940	First National Bank of Pennsylvania	439	341	2	278	31	30	0	0
10273820	Chemical Bank	255	27	0	0	27	0	0	0
10388580	New York Community Bank	232	28	0	0	28	0	0	0
10365280	Community Bank, National Association	228	35	0	35	0	0	0	0
98013212	HSBC Bank USA, National Association	227	13	0	2	0	3	8	0
99979304	Capital Bank Corporation	195	1	0	0	0	0	1	0
10159120	Old National Bank	191	13	0	0	0	0	0	13
50135830	Navy FCU	180	59	0	0	1	10	44	4
10603660	WesBanco Bank, Inc.	174	161	43	37	60	0	0	21
10393060	NBT Bank, National Association	157	32	0	32	0	0	0	0
30010670	Northwest Bank	147	132	0	110	19	3	0	0

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10478780	First Commonwealth Bank	132	132	0	104	28	0	0	0
98505172	Carter Bank & Trust	124	89	0	0	0	0	89	0
10486920	Fulton Bank, National Association	118	107	0	95	0	0	12	0
96693262	Union Bank & Trust	115	115	0	0	0	0	115	0
10443500	The Park National Bank	113	113	0	0	113	0	0	0
10258284	Berkshire Bank	107	2	0	2	0	0	0	0
10442400	First Financial Bank	103	66	0	0	62	0	0	4
10179080	First Merchants Bank	103	8	0	0	8	0	0	0
10574880	United Bank	102	93	4	0	0	7	82	0
10151420	MB Financial Bank, National Association	90	1	0	1	0	0	0	0
70008244	Bank of Hope	87	1	0	0	0	0	1	0
10600060	City National Bank of West Virginia	87	87	59	0	3	0	14	11
10344920	Provident Bank	85	5	0	5	0	0	0	0
10221900	Community Trust Bank, Inc.	81	77	6	0	0	0	0	71
10441300	Peoples Bank	78	78	12	0	61	0	0	5
96682835	Bank of North Carolina	75	9	0	0	0	0	9	0
30212340	Dollar Bank, A Federal Savings Bank	66	66	0	36	26	0	4	0
10151640	The Northern Trust Company	65	1	0	0	1	0	0	0
10495880	Beneficial Bank	64	42	0	42	0	0	0	0
50318700	Chartway FCU	64	30	0	0	1	0	29	0
10485440	S & T Bank	62	62	0	61	1	0	0	0
10417620	Southern Bank and Trust Company	61	10	0	0	0	0	10	0
50318850	Pentagon FCU	61	21	0	4	0	6	10	1
10113060	Wilmington Savings Fund Society, FSB	59	21	0	21	0	0	0	0
10052600	Cathay Bank	59	1	0	0	0	1	0	0
10602100	United Bank, Inc.	58	58	51	4	1	2	0	0
10412980	The Fidelity Bank	58	3	0	0	0	0	3	0
50123880	Unify Financial FCU	55	6	0	0	0	0	4	2
50113790	Kinecta FCU	51	2	0	0	0	1	1	0
98443668	Park Sterling Bank	50	6	0	0	0	0	6	0

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10176480	German American Bancorp d/b/a German American	49	1	0	0	0	0	0	1
10205540	Armed Forces Bank, National Association	48	4	0	0	0	0	2	2
50358910	First Technology FCU	47	1	0	0	0	1	0	0
10602420	First Community Bank	46	39	19	0	0	0	20	0
10219930	Republic Bank & Trust Company	45	34	0	0	1	0	0	33
10247620	Sandy Spring Bank	45	44	0	0	0	37	7	0
10054274	Hanmi Bank	45	1	0	0	0	0	1	0
30000980	HomeTrust Bank	44	10	0	0	0	0	10	0
10501460	Univest Bank and Trust Co.	40	37	0	37	0	0	0	0
50239310	Visions FCU	40	8	0	8	0	0	0	0
30041920	First Federal Bank of the Midwest	40	33	0	0	33	0	0	0
10476800	CNB Bank	39	39	0	28	11	0	0	0
30045440	Third Federal Savings & Loan Association of Cleveland	39	22	0	0	22	0	0	0
10216400	Whitaker Bank, Inc	39	39	0	0	0	0	0	39
50361542	Self-Help CU	36	1	0	0	0	0	1	0
10217640	United Bank & Capital Trust Company	35	35	0	0	0	0	0	35
50110010	Chevron FCU	35	3	0	0	0	3	0	0
96787596	Towne Bank	35	30	0	0	0	0	30	0
10219960	Stock Yards Bank & Trust Company	35	28	0	0	3	0	0	25
10432120	The Farmers National Bank of Canfield	35	35	1	1	33	0	0	0
10439980	LCNB National Bank	34	34	0	0	34	0	0	0
10370220	Chemung Canal Trust Company	34	3	0	3	0	0	0	0
10160220	Banterra Bank	33	2	0	0	0	0	0	2
96727770	Premier Bank, Inc.	33	27	23	0	0	0	4	0
50273920	Franklin Mint FCU	33	33	0	33	0	0	0	0
96681058	The PrivateBank and Trust Company	31	1	0	0	1	0	0	0
10501380	Somerset Trust Company	31	31	0	30	0	1	0	0
50248370	Truliant FCU	31	3	0	0	0	0	3	0
10474980	The Bryn Mawr Trust Company	31	29	0	29	0	0	0	0
96689284	Summit Community Bank, Inc	30	30	18	0	0	0	12	0

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50360708	Baxter CU	29	1	0	0	1	0	0	0
50211150	United FCU	29	2	0	0	2	0	0	0
10486540	NexTier Bank, National Association	29	29	0	29	0	0	0	0
50217780	Anheuser-Busch Empl CU	28	2	0	0	1	0	1	0
10484880	Wayne Bank	28	16	0	16	0	0	0	0
30904370	Union Savings Bank	28	25	0	0	25	0	0	0
50201320	Genisys CU	28	1	0	1	0	0	0	0
10447880	Civista Bank	27	27	0	0	27	0	0	0
50144200	Delta Community CU	27	1	0	0	0	0	0	1
50269910	Clearview FCU	27	26	0	25	1	0	0	0
50271290	American Heritage FCU	27	26	0	26	0	0	0	0
50125620	Xceed Financial FCU	26	2	0	1	1	0	0	0
50270730	TruMark Financial CU	26	26	0	26	0	0	0	0
10496800	BNY Mellon, National Association	26	7	0	7	0	0	0	0
10219500	Central Bank & Trust Co.	26	26	0	0	0	0	0	26
97694328	Forcht Bank, National Association	26	26	0	0	0	0	0	26
10221740	South Central Bank, Inc.	26	26	0	0	0	0	0	26
10583780	Citizens and Farmers Bank	26	26	0	0	0	0	26	0
30012540	ESSA Bank & Trust	26	26	0	26	0	0	0	0
10498000	Citizens & Northern Bank	26	24	0	24	0	0	0	0
10483160	Peoples Security Bank and Trust Company	25	23	0	23	0	0	0	0
10572000	The National Bank of Blacksburg	25	25	0	0	0	0	25	0
10571020	Burke & Herbert Bank & Trust Company	25	25	0	0	0	0	25	0
50115510	Logix FCU	24	2	0	0	0	1	1	0
50264780	Wright Patt CU Inc	24	24	0	0	24	0	0	0
10574200	American National Bank and Trust Company	24	16	0	0	0	0	16	0
10489320	First Citizens Community Bank	24	23	0	23	0	0	0	0
10245860	First United Bank & Trust	23	23	8	0	0	15	0	0
30052850	Penn Community Bank	23	23	0	23	0	0	0	0
96673368	Old Line Bank	23	23	0	0	0	23	0	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
10577660	The First Bank and Trust Company	23	19	0	0	0	0	19	0
10494960	Orrstown Bank	23	23	0	21	0	2	0	0
96730560	Green Bank, National Association	23	1	0	0	0	0	0	1
10429220	The Farmers & Merchants State Bank	23	19	0	0	19	0	0	0
50317340	Apple FCU	23	23	0	0	0	0	23	0
50248900	Sharonview FCU	23	1	0	1	0	0	0	0
50149800	Corporate America Family CU	23	3	0	1	1	0	1	0
10482500	PEOPLESBANK, A Codorus Valley Company	23	23	0	16	0	7	0	0
10531300	Commercial Bank	23	10	0	0	0	0	0	10
50318530	Newport News Shipbuilding Empl CU Inc d/b/a BayPort CU	23	23	0	0	0	0	23	0
96727771	EagleBank	22	16	0	0	0	7	9	0
98170576	Sonabank	22	22	0	0	0	10	12	0
10482160	ACNB Bank	22	22	0	22	0	0	0	0
50332790	Altra FCU	21	1	0	0	0	0	0	1
10476100	Farmers and Merchants Trust Company of Chambersburg	21	21	0	21	0	0	0	0
50276820	Citadel FCU	21	21	0	20	0	1	0	0
10383760	The Bank of New York Mellon	21	1	0	1	0	0	0	0
98066766	Beal Bank USA	21	3	0	1	0	1	1	0
50297600	Eastman CU	21	3	0	0	0	0	3	0
50163250	State Farm FCU	21	4	0	1	1	1	1	0
50263520	Directions CU	20	19	0	0	19	0	0	0
50195020	Hanscom FCU	20	1	0	0	0	0	1	0
50356000	InTouch CU	20	2	0	0	0	0	2	0
97966616	WashingtonFirst Bank	20	18	0	0	0	5	13	0
50278150	Members 1st FCU	20	20	0	20	0	0	0	0
50191710	State Empl CU of Maryland Inc	20	20	0	0	0	20	0	0
10491140	Mid Penn Bank	20	20	0	20	0	0	0	0
10219600	Independence Bank	20	20	0	0	0	0	0	20
50112210	Farmers Insurance Group FCU	20	1	0	0	1	0	0	0
10478920	FNCB Bank	19	19	0	19	0	0	0	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
10582780	Essex Bank	19	19	0	0	0	5	14	0
10216040	The Cecilian Bank	19	19	0	0	0	0	0	19
10434880	The State Bank and Trust Company	19	18	0	0	18	0	0	0
10475720	Community Bank	19	19	0	19	0	0	0	0
50318020	Langley FCU	19	19	0	0	0	0	19	0
30027060	Firsttrust Savings Bank	19	18	0	18	0	0	0	0
10241140	Shore United Bank	19	15	0	0	0	15	0	0
10441400	The Citizens Savings Bank	19	19	0	0	19	0	0	0
96731061	New Peoples Bank, Inc.	19	18	1	0	0	0	17	0
50135200	Justice FCU	18	4	1	0	0	0	3	0
50328010	Connexus CU	18	3	0	0	3	0	0	0
30065680	First Harrison Bank	18	5	0	0	0	0	0	5
50318410	ABNB FCU	18	16	0	0	0	0	16	0
10436820	The Croghan Colonial Bank	18	18	0	0	18	0	0	0
30047270	Heritage Bank USA, Inc.	18	11	0	0	0	0	0	11
50319610	Virginia CU, Inc.	18	18	0	0	0	0	18	0
50236850	Corning FCU	18	3	0	3	0	0	0	0
10576640	The Old Point National Bank of Phoebus	18	18	0	0	0	0	18	0
96680836	Heritage Bank, Inc	18	18	0	0	0	0	0	18
10486040	AmeriServ Financial Bank	17	17	0	17	0	0	0	0
10473440	First Keystone Community Bank	17	17	0	17	0	0	0	0
96673144	Beal Bank, SSB	17	4	0	1	2	1	0	0
50182220	Park Community CU, Inc.	17	14	0	0	0	0	0	14
96683149	Unity Bank	17	1	0	1	0	0	0	0
10221680	Kentucky Bank	17	17	0	0	0	0	0	17
96843315	Bank of the James	17	17	0	0	0	0	17	0
30002300	Standard Bank, PaSB	17	17	0	15	0	2	0	0
30035360	First Federal Lakewood	17	17	0	0	17	0	0	0
10441740	The Vinton County National Bank	17	17	0	0	17	0	0	0
10442560	The Commercial and Savings Bank of Millersburg, Ohio	16	16	0	0	16	0	0	0

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10478460	DNB First, National Association	16	16	0	16	0	0	0	0
50168910	MidWest America FCU	16	2	0	0	0	0	0	2
10218100	PBI Bank	16	16	0	0	0	0	0	16
50248050	Marine FCU	16	2	0	0	0	0	2	0
10219220	First Southern National Bank	16	16	0	0	0	0	0	16
10437040	The Ohio Valley Bank Company	16	16	2	0	14	0	0	0
10220700	The Monticello Banking Company	16	16	0	0	0	0	0	16
10485860	Jersey Shore State Bank	16	16	0	16	0	0	0	0
96844645	Access National Bank	16	16	0	0	0	0	16	0
10577300	Skyline National Bank	16	15	0	0	0	0	15	0
10577500	Bank of Lancaster, A Division of Virginia Commonwealth Bank	16	16	0	0	0	0	16	0
10433980	The Union Bank Company	16	16	0	0	16	0	0	0
10222780	Citizens Union Bank of Shelbyville	16	16	0	0	0	0	0	16
10222820	Commonwealth Bank & Trust Company	16	16	0	0	0	0	0	16
10480280	The Farmers National Bank of Emlenton	16	16	0	16	0	0	0	0
10530080	Citizens Bank	16	1	0	0	0	0	1	0
10473040	Kish Bank	15	15	0	15	0	0	0	0
97024716	Union Community Bank	15	15	0	15	0	0	0	0
10489620	Riverview Bank	15	15	0	15	0	0	0	0
98064938	Goldman Sachs Bank USA	15	1	0	1	0	0	0	0
10572720	The Bank of Southside Virginia	15	15	0	0	0	0	15	0
30036760	United Fidelity Bank, fsb	15	1	0	0	1	0	0	0
50297690	Southeast Financial CU	15	1	0	0	0	0	0	1
96689416	First Mariner Bank	15	15	0	0	0	15	0	0
50203350	FME FCU	15	2	0	0	1	0	1	0
10582520	First Bank	15	15	0	0	0	0	15	0
50181120	Fort Knox FCU	15	15	0	0	0	0	0	15
50164100	Alliant CU	15	1	0	0	0	0	1	0
10490920	The Juniata Valley Bank	15	15	0	15	0	0	0	0
10578420	The Bank of Marion	15	14	0	0	0	0	14	0

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10577520	Chesapeake Bank	14	14	0	0	0	0	14	0
10219620	Cumberland Valley National Bank & Trust Company	14	14	0	0	0	0	0	14
10434180	The Cortland Savings & Banking Co.	14	14	0	0	14	0	0	0
50181750	L&N FCU	14	13	0	0	0	0	0	13
50189770	First Peoples Community FCU	14	14	2	2	0	10	0	0
10216960	Edmonton State Bank	14	14	0	0	0	0	0	14
10499540	1st Summit Bank	14	14	0	14	0	0	0	0
10442320	The Middlefield Banking Company	14	14	0	0	14	0	0	0
50169740	Three Rivers FCU	14	1	0	0	1	0	0	0
10473940	First Columbia Bank & Trust Co	14	14	0	14	0	0	0	0
98064718	Howard Bank	14	14	0	1	0	13	0	0
50255960	General Electric CU	14	12	0	0	11	0	0	1
96673216	Republic First Bank d/b/a Republic Bank	14	13	0	13	0	0	0	0
50117740	Northrop Grumman FCU	14	5	0	0	0	4	1	0
10486060	Jonestown Bank and Trust Company	13	13	0	13	0	0	0	0
50256020	GenFed Financial CU, Inc	13	10	0	0	10	0	0	0
50282460	USX FCU	13	13	0	11	2	0	0	0
10576450	TruPoint Bank	13	11	0	0	0	0	11	0
10221640	Citizens Bank of Kentucky, Inc.	13	13	0	0	0	0	0	13
98303134	Metro City Bank	13	1	0	0	0	0	1	0
10442660	Consumers National Bank	13	13	0	0	13	0	0	0
10570940	Highlands Union Bank	13	7	0	0	0	0	7	0
50258740	Cardinal CU Inc	13	13	0	0	13	0	0	0
10223640	Citizens Deposit Bank and Trust	13	13	0	0	3	0	0	10
10244120	Hebron Savings Bank	13	13	0	0	0	13	0	0
50263050	Superior CU, Inc.	13	13	0	0	13	0	0	0
10486240	Royal Bank America	13	13	0	13	0	0	0	0
10220940	Traditional Bank, Inc.	13	13	0	0	0	0	0	13
10429100	The Andover Bank	13	13	0	5	8	0	0	0
10476780	CBT Bank	13	13	0	13	0	0	0	0



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50130700	General Electric Empl FCU	13	1	0	1	0	0	0	0
96729692	MVB Bank, Inc.	13	13	12	0	0	0	1	0
10493980	The First National Bank and Trust Company of Newton	13	13	0	13	0	0	0	0
50191310	Educational Systems FCU	13	13	0	0	0	13	0	0
99978464	Bay Bank, FSB	13	13	0	0	0	13	0	0
96692584	Customers Bank	12	10	0	10	0	0	0	0
10480420	The Ephrata National Bank	12	12	0	12	0	0	0	0
50191780	Tower FCU	12	12	0	0	0	12	0	0
50259270	Universal 1 CU, Inc	12	12	0	0	12	0	0	0
50262280	Seven Seventeen CU Inc	12	12	0	0	12	0	0	0
50263360	Sun FCU	12	12	0	6	6	0	0	0
50257370	KEMBA Financial CU	12	12	0	0	12	0	0	0
10385109	Woori America Bank	12	4	0	2	0	1	1	0
98564628	The Bank of Princeton	12	3	0	3	0	0	0	0
50189790	Andrews FCU	12	6	0	1	0	5	0	0
10484860	The Honesdale National Bank	12	12	0	12	0	0	0	0
10577440	Benchmark Community Bank	12	12	0	0	0	0	12	0
50135800	NASA FCU	12	10	0	0	0	7	3	0
50243230	Ukrainian FCU	12	1	0	0	1	0	0	0
50318730	Member One FCU	12	12	0	0	0	0	12	0
30055230	Marquette Savings Bank	12	12	0	12	0	0	0	0
10216320	First & Farmers National Bank, Inc.	12	12	0	0	0	0	0	12
96692785	Community Bank of the Chesapeake	12	12	0	0	0	10	2	0
96691452	Planters Bank, Inc.	12	8	0	0	0	0	0	8
10497940	QNB Bank	12	12	0	12	0	0	0	0
10571860	Bank of Clarke County	12	12	0	0	0	0	12	0
50190540	GEICO FCU	12	3	0	0	0	1	2	0
30045430	Prudential Bank	12	12	0	12	0	0	0	0
50317480	1st Advantage FCU	12	12	0	0	0	0	12	0
50254060	Telhio CU Inc	12	12	0	0	12	0	0	0

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50257350	Kemba CU	12	11	0	0	10	0	0	1
30017840	First Bank Richmond	12	4	0	0	4	0	0	0
50319310	Freedom First FCU	12	12	0	0	0	0	12	0
50274580	Belco Community CU	12	12	0	12	0	0	0	0
30007090	Guardian Savings Bank, FSB	11	11	0	0	6	0	0	5
70008567	Fortera FCU	11	5	0	0	0	0	0	5
10478900	Fidelity Deposit and Discount Bank	11	11	0	11	0	0	0	0
50191160	National Institutes of Health FCU	11	8	0	0	0	8	0	0
30041950	Wayne Savings Community Bank	11	11	0	0	11	0	0	0
50324730	Fairmont FCU	11	11	11	0	0	0	0	0
99986690	Urban Partnership Bank	11	1	0	0	1	0	0	0
50319750	University of Virginia Community CU, Inc.	11	11	0	0	0	0	11	0
97157872	Westfield Bank, FSB	11	11	0	0	11	0	0	0
10215000	Peoples Exchange Bank	11	11	0	0	0	0	0	11
10495160	First Northern Bank and Trust Company	11	11	0	11	0	0	0	0
10490900	Pennian Bank	11	11	0	11	0	0	0	0
10499580	Mercer County State Bank	11	11	0	11	0	0	0	0
10599900	Clear Mountain Bank	11	11	10	0	0	1	0	0
10216740	The Farmers National Bank of Danville	11	11	0	0	0	0	0	11
10452480	First State Bank	11	11	0	0	11	0	0	0
96692868	First Security Bank	11	8	0	0	0	0	0	8
10242060	The Bank of Delmarva	11	6	0	0	0	6	0	0
10223040	The Citizens National Bank of Somerset	11	11	0	0	0	0	0	11
10220300	First Kentucky Bank, Inc.	11	11	0	0	0	0	0	11
10434440	Heartland Bank	11	11	0	0	11	0	0	0
50277190	Everence FCU	11	8	0	6	1	0	1	0
50182760	Kentucky Telco CU	11	11	0	0	0	0	0	11
97900922	Congressional Bank	11	8	0	0	0	7	1	0
50207310	Parda FCU	11	1	0	1	0	0	0	0
10583500	The Fauquier Bank	11	11	0	0	0	0	11	0

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10529280	Security Bank and Trust Company	10	1	0	0	0	0	0	1
10240260	Calvin B. Taylor Banking Company	10	9	0	0	0	9	0	0
50278930	Philadelphia FCU	10	10	0	10	0	0	0	0
30042460	Town Square Bank	10	10	0	0	0	0	0	10
10437880	Greenville National Bank	10	9	0	0	9	0	0	0
50361910	Healthcare First CU	10	10	0	10	0	0	0	0
50251930	B M I FCU	10	10	0	0	10	0	0	0
10572520	Bank of Botetourt	10	10	0	0	0	0	10	0
50189700	Aberdeen Proving Ground FCU	10	10	0	0	0	10	0	0
10443000	1st National Bank	10	10	0	0	10	0	0	0
10572020	Citizens Bank & Trust Co.	10	10	0	0	0	0	10	0
98641236	Revere Bank	10	10	0	0	0	10	0	0
10487320	Commercial Bank & Trust of PA	10	10	0	10	0	0	0	0
50281600	Sun East FCU	10	9	0	9	0	0	0	0
30064200	Cecil Bank	10	10	0	0	0	10	0	0
10214940	Wilson & Muir Bank & Trust Company	10	10	0	0	0	0	0	10
10221940	First State Financial, Inc.	10	9	0	0	0	0	0	9
96844341	Village Bank	10	10	0	0	0	0	10	0
50191580	First Financial of Maryland FCU	10	10	0	0	0	10	0	0
10439480	The Killbuck Savings Bank Co.	10	10	0	0	10	0	0	0
10215180	Peoples Bank & Trust Company of Madison County	10	10	0	0	0	0	0	10
50254500	River Valley CU	10	10	0	0	10	0	0	0
50325250	Bayer Heritage FCU	10	6	3	2	1	0	0	0
50237840	Aspire FCU	9	1	0	0	0	0	1	0
30035860	Washington Financial Bank	9	9	0	9	0	0	0	0
50269830	Mountain Laurel FCU	9	9	0	9	0	0	0	0
30070120	Harleysville Bank	9	9	0	9	0	0	0	0
30000410	First Federal Bank of Ohio	9	9	0	0	9	0	0	0
10434420	The Community Bank	9	9	0	0	9	0	0	0
30046420	Liberty Savings Bank, F.S.B.	9	1	0	0	1	0	0	0

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10222100	The First Commonwealth Bank of Prestonsburg, Inc.	9	9	0	0	0	0	0	9
50276450	Patriot FCU	9	9	0	6	0	3	0	0
10431060	The Citizens National Bank of Bluffton	9	9	0	0	9	0	0	0
10433020	The North Side Bank and Trust Company	9	9	0	0	9	0	0	0
96673729	Woodlands Bank	9	9	0	9	0	0	0	0
50168760	Evansville Teachers FCU	9	2	0	0	0	0	0	2
50273360	Erie FCU	9	9	0	9	0	0	0	0
50107660	Honda FCU	9	5	0	0	5	0	0	0
30038660	CFSBank	9	9	0	9	0	0	0	0
10582880	Farmers & Merchants Bank	9	9	0	0	0	0	9	0
10170980	First Bank of Berne	9	1	0	0	1	0	0	0
10113200	Industrial Bank	9	2	0	0	0	2	0	0
50135840	Nymeo FCU	9	9	0	0	0	9	0	0
50136370	Treasury Department FCU	9	1	0	0	0	0	1	0
50251720	Atomic CU Inc	9	9	0	0	9	0	0	0
30057400	First Shore Federal Savings & Loan Association	9	7	0	0	0	7	0	0
10249460	The Farmers Bank of Willards	9	8	0	0	0	8	0	0
10220320	FNB Bank, Inc.	9	9	0	0	0	0	0	9
30907344	Presidential Bank, FSB	9	8	0	0	0	2	6	0
10472640	Merchants Bank of Bangor	9	9	0	9	0	0	0	0
50356690	FedEx Employees Credit Association FCU	9	1	0	1	0	0	0	0
50315950	New England FCU	8	1	0	0	1	0	0	0
10601580	Union Bank, Inc.	8	8	8	0	0	0	0	0
10488940	Luzerne Bank	8	8	0	8	0	0	0	0
10582260	Pioneer Bank	8	8	0	0	0	0	8	0
30047790	PennCrest Bank	8	8	0	8	0	0	0	0
98249876	First Priority Bank	8	8	0	8	0	0	0	0
50181350	Members Heritage CU	8	7	0	0	0	0	0	7
50360216	Service 1st FCU	8	8	0	8	0	0	0	0
50319770	URW Community FCU	8	8	0	0	0	0	8	0

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10218060	The First National Bank of Grayson	8	8	0	0	0	0	0	8
10584060	Farmers Bank	8	8	0	0	0	0	8	0
50275120	AmeriChoice FCU	8	8	0	8	0	0	0	0
10445220	The Old Fort Banking Company	8	8	0	0	8	0	0	0
50251730	Associated School Empl CU Inc	8	8	0	0	8	0	0	0
10578580	Bank of McKenney	8	8	0	0	0	0	8	0
10571180	First National Bank	8	8	0	0	0	0	8	0
30037580	Rosedale Federal Savings & Loan Association	8	8	0	0	0	8	0	0
50254790	Incenta FCU	8	8	0	0	8	0	0	0
50277240	Merck Sharp & Dohme FCU	8	8	0	8	0	0	0	0
50319010	NMA FCU	8	8	0	0	0	0	8	0
30019040	Hamilton Bank	8	8	0	0	0	8	0	0
50135880	Northwest FCU	8	8	0	0	0	1	7	0
50320000	DuPont Community CU	8	8	0	0	0	0	8	0
10452020	The First Citizens National Bank of Upper Sandusky	8	8	0	0	8	0	0	0
10218500	Field & Main Bank	8	7	0	0	0	0	0	7
50325700	First Choice America Community FCU	8	8	6	0	2	0	0	0
50325050	Pioneer West Virginia FCU	8	8	7	0	1	0	0	0
50136490	Signal Financial FCU	8	5	0	0	0	3	2	0
30021900	First Federal Savings & Loan Association of Greene County	8	8	1	7	0	0	0	0
98505746	First Bank	8	1	0	1	0	0	0	0
50252920	Century FCU	8	8	0	0	8	0	0	0
50283610	Benchmark FCU	8	6	0	5	0	0	1	0
10576420	Grundy National Bank	8	8	0	0	0	0	8	0
50282930	First Commonwealth FCU	8	8	0	8	0	0	0	0
50191110	Municipal Empl CU of Baltimore Inc	8	8	0	0	0	8	0	0
50317650	CommonWealth One FCU	8	6	0	0	0	0	6	0
10243600	The Bank of Glen Burnie	8	8	0	0	0	8	0	0
50256340	Firefighters Community CU, Inc.	8	8	0	0	8	0	0	0
50239450	First Heritage FCU	8	2	0	2	0	0	0	0

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10599760	CNB Bank, Inc.	8	8	5	0	0	3	0	0
50253140	CinFed Empl FCU	8	8	0	0	5	0	0	3
10603520	Progressive Bank, National Association	8	8	7	0	1	0	0	0
96761602	Citizens First Bank, Inc.	8	8	0	0	0	0	0	8
10239060	Harford Bank	8	8	0	0	0	8	0	0
50254470	Day Air CU Inc	8	8	0	0	8	0	0	0
50257680	New Horizons CU Inc	8	8	0	1	7	0	0	0
10574300	Virginia Bank & Trust Company	8	8	0	0	0	0	8	0
30004160	Malvern Federal Savings Bank	8	8	0	8	0	0	0	0
10429520	Sutton Bank	8	8	0	0	8	0	0	0
30065030	Citizens Savings Bank	8	8	0	8	0	0	0	0
10507200	PS Bank	8	8	0	8	0	0	0	0
10577980	Virginia Community Bank	8	8	0	0	0	0	8	0
50232150	South Jersey FCU	8	2	0	2	0	0	0	0
30065860	Home Federal Bank Corporation	7	4	0	0	0	0	0	4
10437280	The Genoa Banking Company	7	7	0	0	7	0	0	0
10603160	The Poca Valley Bank, Inc.	7	7	7	0	0	0	0	0
50276900	People First FCU	7	7	0	7	0	0	0	0
50182190	Signet FCU	7	7	0	0	0	0	0	7
50295570	Appalachian Community FCU	7	3	0	0	0	0	1	2
10442720	Minster Bank	7	7	0	0	7	0	0	0
10494940	Community State Bank of Orbisonia	7	7	0	7	0	0	0	0
10603340	MCNB Bank and Trust Co.	7	7	6	0	0	0	1	0
30023490	Arundel Federal Savings Bank	7	7	0	0	0	7	0	0
30907276	Abacus Federal Savings Bank	7	1	0	1	0	0	0	0
30901210	Colombo Bank	7	5	0	0	0	5	0	0
50261730	Ohio Catholic FCU	7	7	0	0	7	0	0	0
50293620	Comtrust FCU	7	1	0	1	0	0	0	0
10505960	West Milton State Bank	7	7	0	7	0	0	0	0
50206490	Cornerstone Community Financial CU	7	1	0	0	1	0	0	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
10218400	Peoples Bank & Trust Company of Hazard	7	7	0	0	0	0	0	7
30041710	First Federal Savings & Loan Association of Lorain	7	7	0	0	7	0	0	0
50317030	Henrico FCU	7	7	0	0	0	0	7	0
10429480	The Hocking Valley Bank	7	7	0	0	7	0	0	0
10484840	The Dime Bank	7	7	0	7	0	0	0	0
10575500	The Bank of Fincastle	7	7	0	0	0	0	7	0
10602220	The Grant County Bank	7	7	7	0	0	0	0	0
50190070	Bull Dog FCU	7	7	0	1	0	6	0	0
30047760	Reliance Savings Bank d/b/a Reliance Bank	7	7	0	7	0	0	0	0
97441046	Embassy Bank for the Lehigh Valley	7	7	0	7	0	0	0	0
50240680	McGraw Hill FCU	7	1	0	1	0	0	0	0
10489500	Marion Center Bank	7	7	0	7	0	0	0	0
10239710	The Harbor Bank of Maryland	7	7	0	0	0	7	0	0
10241220	The Peoples Bank	7	7	0	0	0	7	0	0
10501200	Hamlin Bank and Trust Company	7	6	0	6	0	0	0	0
50190170	Cedar Point FCU	7	7	0	0	0	7	0	0
10218800	Citizens Guaranty Bank	7	7	0	0	0	0	0	7
10443840	The Farmers State Bank	7	6	0	0	6	0	0	0
50180770	Commonwealth CU	7	7	0	0	0	0	0	7
10223500	United Southern Bank	7	7	0	0	0	0	0	7
50278960	Eagle One FCU	7	3	0	3	0	0	0	0
50348470	Pathways Financial CU	7	7	0	0	7	0	0	0
50180870	C-Plant FCU	7	7	0	0	0	0	0	7
10485920	Mauch Chunk Trust Co	7	7	0	7	0	0	0	0
50136410	Advantage Financial FCU	7	1	0	1	0	0	0	0
10494560	The Northumberland National Bank	7	7	0	7	0	0	0	0
50316770	CALL FCU	7	6	0	0	0	0	6	0
50283420	Cross Valley FCU	7	7	0	7	0	0	0	0
10246800	Provident State Bank, Inc.	7	7	0	0	0	7	0	0
10249620	Woodsboro Bank	7	7	0	0	0	7	0	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
10443320	The Henry County Bank	7	7	0	0	7	0	0	0
50272080	Star USA FCU	7	7	7	0	0	0	0	0
10246880	The Queenstown Bank of Maryland	7	7	0	0	0	7	0	0
50297910	United Southeast FCU	7	3	0	0	0	0	3	0
10433640	The Peoples Bank Co	7	7	0	0	7	0	0	0
50254640	Desco FCU	7	7	1	0	5	0	0	1
50136290	State Department FCU	7	4	0	0	0	1	3	0
50264350	Dover-Phila FCU	6	6	0	0	6	0	0	0
30028930	First Federal Savings & Loan Association of Newark	6	6	0	0	6	0	0	0
50253650	Ohio Educational CU Inc	6	6	0	0	6	0	0	0
10602820	Jefferson Security Bank	6	6	5	0	0	1	0	0
50276290	Widget FCU	6	6	0	6	0	0	0	0
96853790	Citizens Community Bank	6	3	0	0	0	0	3	0
50135590	FedChoice FCU	6	3	0	1	0	2	0	0
10428580	Liberty National Bank	6	6	0	0	6	0	0	0
10240860	1880 Bank	6	6	0	0	0	6	0	0
10243140	Farmers & Merchants Bank	6	6	0	0	0	6	0	0
30043810	First Federal Savings Bank of Kentucky	6	6	0	0	0	0	0	6
10600700	Pendleton Community Bank, Inc.	6	6	4	0	0	0	2	0
10573680	Miners Exchange Bank	6	5	0	0	0	0	5	0
98377268	John Marshall Bank	6	5	0	0	0	1	4	0
50253190	Cincinnati Ohio Police FCU	6	6	0	0	6	0	0	0
30045040	Phoenixville Federal Bank and Trust	6	6	0	6	0	0	0	0
30024580	United Savings Bank	6	6	0	6	0	0	0	0
50280960	Penn East FCU	6	6	0	6	0	0	0	0
50190260	Chessie FCU	6	6	2	0	0	4	0	0
50255120	Emery FCU	6	6	0	0	6	0	0	0
10441820	The First National Bank of McConnelsville	6	6	0	0	6	0	0	0
96689478	The First Capital Bank of Kentucky	6	6	0	0	0	0	0	6
50134790	Agriculture FCU	6	2	0	0	0	1	1	0



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50317230	Argent FCU	6	6	0	0	0	0	6	0
50260070	PSE CU Inc	6	6	0	0	6	0	0	0
10490500	First Community Bank of Mercersburg	6	6	0	6	0	0	0	0
50191700	Securityplus FCU	6	6	0	0	0	6	0	0
10448700	The Somerville National Bank	6	6	0	0	6	0	0	0
50277230	Members Choice Financial CU	6	6	0	6	0	0	0	0
50344070	P & G Mehoopany Empl FCU	6	6	0	6	0	0	0	0
10224040	United Cumberland Bank	6	3	0	0	0	0	0	3
96689704	Surrey Bank & Trust	6	1	0	0	0	0	1	0
96728368	Virginia National Bank	6	6	0	0	0	0	6	0
50229090	First Atlantic FCU	6	1	0	1	0	0	0	0
10603500	West Union Bank	6	6	6	0	0	0	0	0
10429180	The Apple Creek Banking Company	6	6	0	0	6	0	0	0
10430560	The First National Bank Bellevue	6	6	0	0	6	0	0	0
10492700	The Muncy Bank and Trust Company	6	6	0	6	0	0	0	0
30002340	West View Savings Bank	6	6	0	6	0	0	0	0
50257480	KH Network CU	6	6	0	0	6	0	0	0
50277730	New Cumberland FCU	6	6	0	6	0	0	0	0
10601380	First Exchange Bank	6	6	6	0	0	0	0	0
50319230	New Generations FCU	6	6	0	0	0	0	6	0
50264210	Vacationland FCU	6	6	0	0	6	0	0	0
10217360	People's Bank of Kentucky, Inc.	6	6	0	0	0	0	0	6
30023760	Sharon Savings Bank	6	6	0	6	0	0	0	0
30901430	Bay-Vanguard Federal Savings Bank	6	6	0	0	0	6	0	0
50136000	US Postal Service FCU	6	3	0	1	0	2	0	0
50360906	Ardent FCU	6	6	0	6	0	0	0	0
50251080	Buckeye State CU Inc	6	6	0	0	6	0	0	0
97707718	York Traditions Bank	6	6	0	6	0	0	0	0
10245900	Bank of Ocean City	6	5	0	0	0	5	0	0
10218360	Hancock Bank & Trust Company	6	6	0	0	0	0	0	6

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30037240	American Savings Bank, FSB	6	6	0	0	5	0	0	1
10447080	The Richwood Banking Company	6	6	0	0	6	0	0	0
10580010	Farmers and Miners Bank	6	6	0	0	0	0	6	0
10600160	Bank of Charles Town	6	6	5	0	0	1	0	0
10214920	Town & Country Bank and Trust Company	6	6	0	0	0	0	0	6
10485900	Jim Thorpe Neighborhood Bank	6	6	0	6	0	0	0	0
10222360	First & Peoples Bank and Trust Company	6	6	0	0	0	0	0	6
30040880	First Federal Community Bank, National Association	6	6	0	0	6	0	0	0
50319890	Beacon CU, Inc.	6	6	0	0	0	0	6	0
10602600	The Bank of Romney	6	6	6	0	0	0	0	0
98645858	First Virginia Community Bank	6	6	0	0	0	0	6	0
10471900	Apollo Trust Company	6	6	0	6	0	0	0	0
96683282	First Sentinel Bank	6	6	0	0	0	0	6	0
10482020	First United National Bank	6	6	0	6	0	0	0	0
30033130	First Federal Savings & Loan Association of Delta	6	6	0	0	6	0	0	0
96732834	Parke Bank	6	1	0	1	0	0	0	0
10451380	The First National Bank of Waverly	6	6	0	0	6	0	0	0
10218720	PBK Bank, Inc.	6	6	0	0	0	0	0	6
10446460	The Farmers Bank & Savings Company	6	6	2	0	4	0	0	0
50278100	Northwood FCU	6	6	0	6	0	0	0	0
50258860	MidUSA CU	6	6	0	0	6	0	0	0
97440534	Frederick County Bank	6	6	0	0	0	6	0	0
10221580	The Paducah Bank and Trust Company	6	6	0	0	0	0	0	6
10489520	Mars Bank	5	5	0	5	0	0	0	0
50254570	Heartland FCU	5	5	0	0	5	0	0	0
10445600	The First National Bank of Pandora	5	5	0	0	5	0	0	0
50280920	Hidden River CU	5	5	0	5	0	0	0	0
50281740	Freedom CU	5	5	0	5	0	0	0	0
30025280	Wallkill Valley Federal Savings & Loan Association	5	1	0	0	0	0	0	1
50258220	Glass City FCU	5	5	0	0	5	0	0	0

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50259840	Ohio Valley Community CU	5	5	0	0	5	0	0	0
96673720	County First Bank	5	5	0	0	0	5	0	0
10216120	King Southern Bank	5	5	0	0	0	0	0	5
10220660	The Farmers Bank of Milton	5	4	0	0	0	0	0	4
50271200	Priority First FCU	5	5	0	5	0	0	0	0
50271330	Butler Armco Empl CU	5	5	0	5	0	0	0	0
50135320	The Partnership FCU	5	2	0	0	0	0	2	0
50135480	Democracy FCU	5	4	0	1	0	1	2	0
50282330	Ukrainian Selfreliance FCU	5	4	0	4	0	0	0	0
10571360	The Farmers Bank of Appomattox	5	5	0	0	0	0	5	0
10218600	The Lincoln National Bank of Hodgenville	5	5	0	0	0	0	0	5
10580160	The Bank of Charlotte County	5	5	0	0	0	0	5	0
50254190	C E S CU Inc	5	5	0	0	5	0	0	0
10434160	North Valley Bank	5	5	0	0	5	0	0	0
10600460	Citizens Bank of West Virginia, Inc	5	5	5	0	0	0	0	0
50181380	Jefferson County FCU	5	4	0	0	0	0	0	4
30053900	Huntingdon Valley Bank	5	5	0	5	0	0	0	0
50279070	Police & Fire FCU	5	5	0	5	0	0	0	0
30027620	Mechanics Bank	5	5	0	0	5	0	0	0
10215400	Citizens Bank	5	5	0	0	0	0	0	5
10223940	West Point Bank	5	5	0	0	0	0	0	5
10220760	The Citizens Bank	5	5	0	0	0	0	0	5
98010158	MainStreet Bank	5	5	0	0	0	0	5	0
10603200	The Capon Valley Bank	5	5	3	0	0	0	2	0
96673183	Damascus Community Bank	5	5	0	0	0	5	0	0
10430880	The Citizens Bank Company	5	5	0	0	5	0	0	0
97019628	Hometown Bank of Corbin, Inc. d/b/a Hometown Bank	5	5	0	0	0	0	0	5
30010900	Mifflin County Savings Bank	5	5	0	5	0	0	0	0
50282610	U S S C O Johnstown FCU	5	5	0	5	0	0	0	0
10218740	Hyden Citizens Bank	5	5	0	0	0	0	0	5

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10219580	The Casey County Bank, Inc.	5	5	0	0	0	0	0	5
10219770	River City Bank, Inc	5	5	0	0	0	0	0	5
10449920	First Bank of Ohio	5	5	0	0	5	0	0	0
30002390	Indiana First Savings Bank d/b/a Indiana First Bank	5	5	0	5	0	0	0	0
50255540	TrueCore FCU	5	5	0	0	5	0	0	0
10435080	The First National Bank of Dennison	5	5	0	0	5	0	0	0
10220160	The First National Bank of Manchester	5	5	0	0	0	0	0	5
30039200	First Federal Community Bank	5	5	0	0	5	0	0	0
50252050	Firelands FCU	5	5	0	0	5	0	0	0
50253990	CME FCU	5	5	0	0	5	0	0	0
50135110	Wright Patman Congressional FCU	5	1	0	0	0	0	1	0
50273100	Elliott Community FCU	5	5	0	5	0	0	0	0
50261240	Unity Catholic FCU	5	5	0	0	5	0	0	0
10578960	Peoples Community Bank	5	5	0	0	0	0	5	0
10245580	Middletown Valley Bank	5	5	0	0	0	5	0	0
96682321	Crescent Bank & Trust	5	1	0	1	0	0	0	0
10436520	The Fort Jennings State Bank	5	5	0	0	5	0	0	0
10601280	Logan Bank & Trust Company	5	5	5	0	0	0	0	0
50257440	Quest FCU	5	5	0	0	5	0	0	0
50258680	Homeland CU	5	5	0	0	5	0	0	0
10433100	The Savings Bank	5	5	0	0	5	0	0	0
30001530	Altoona First Savings Bank	5	5	0	5	0	0	0	0
10439500	Kingston National Bank	5	5	0	0	5	0	0	0
30801360	Severn Savings Bank, FSB	5	5	0	0	0	5	0	0
50182870	University of Kentucky FCU	5	5	0	0	0	0	0	5
10215120	Community Financial Services Bank	5	5	0	0	0	0	0	5
10171440	F C N Bank, National Association	5	1	0	0	1	0	0	0
50136220	United States Senate FCU	5	3	0	0	0	0	3	0
50136390	InFirst FCU	5	3	0	0	0	0	3	0
50270160	Lebanon FCU	5	5	0	5	0	0	0	0

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30021790	Ambler Savings Bank	5	5	0	5	0	0	0	0
30022300	Foundation Bank	5	5	0	0	5	0	0	0
30901260	Eastern Savings Bank, FSB	5	5	0	0	0	5	0	0
30901520	St. Casimirs Savings Bank	5	5	0	0	0	5	0	0
30004700	Huntington Federal Savings Bank	5	5	5	0	0	0	0	0
50275810	Viriva Community CU	5	5	0	5	0	0	0	0
30021480	Chesapeake Bank of Maryland	5	5	0	0	0	5	0	0
10481320	Fleetwood Bank	5	5	0	5	0	0	0	0
50262840	Credit Union of Ohio	5	5	0	0	5	0	0	0
50190360	First Eagle FCU	5	2	0	0	0	2	0	0
50190550	Market USA FCU	5	3	0	0	0	3	0	0
30032170	Washington Savings Bank	5	5	0	5	0	0	0	0
50260080	Best Reward CU	5	5	0	0	5	0	0	0
10490860	Mifflinburg Bank & Trust Co	5	5	0	5	0	0	0	0
50135630	Lafayette FCU	5	3	0	0	0	1	2	0
50251390	Antioch CU, Inc	5	5	0	0	5	0	0	0
10451940	Farmers State Bank	5	5	0	0	5	0	0	0
10218880	First State Bank, Inc.	5	5	0	0	0	0	0	5
10216220	First Community Bank of the Heartland, Inc.	5	5	0	0	0	0	0	5
10221160	United Citizens Bank & Trust Company	5	5	0	0	0	0	0	5
10223020	Cumberland Security Bank	5	5	0	0	0	0	0	5
30006410	Greenville Federal	5	5	0	0	5	0	0	0
10220860	Morgantown Bank & Trust Company, Inc.	5	5	0	0	0	0	0	5
10599720	Freedom Bank, Inc.	5	5	5	0	0	0	0	0
10217680	Franklin Bank & Trust Company	5	5	0	0	0	0	0	5
30903980	Slovenian Savings & Loan Association of Franklin-Conemaugh	5	5	0	5	0	0	0	0
10577380	Powell Valley National Bank	5	5	0	0	0	0	5	0
50317330	Fairfax County FCU	5	5	0	0	0	0	5	0
10482660	The Gratz Bank	5	5	0	5	0	0	0	0
96691417	First Sentry Bank, Inc.	5	5	5	0	0	0	0	0

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50262330	Sharefax CU Inc	5	5	0	0	5	0	0	0
10499880	The Scottdale Bank and Trust Company	5	5	0	5	0	0	0	0
10601320	The Harrison County Bank	5	5	5	0	0	0	0	0
10601850	Bank of Mingo	5	5	5	0	0	0	0	0
10443580	First National Bank in New Bremen	5	5	0	0	5	0	0	0
10443780	The Peoples National Bank	5	5	0	0	5	0	0	0
10222680	The Farmers National Bank	5	5	0	0	0	0	0	5
97025010	American Bank & Trust Company, Inc.	5	5	0	0	0	0	0	5
50319330	Blue Eagle CU	5	5	0	0	0	0	5	0
50253220	Greater Cincinnati CU	5	5	0	0	5	0	0	0
96692531	CFG Community Bank	4	4	0	0	0	4	0	0
97156628	Landmark Community Bank	4	4	0	4	0	0	0	0
50253820	CODE CU	4	4	0	0	4	0	0	0
50359582	Long Reach FCU	4	4	4	0	0	0	0	0
50319280	Roanoke Valley Community FCU	4	4	0	0	0	0	4	0
10574820	The Peoples Bank	4	2	0	0	0	0	2	0
50269790	UFCW Local #72 FCU	4	4	0	4	0	0	0	0
50269980	Allentown FCU	4	4	0	4	0	0	0	0
50253110	TruPartner CU	4	4	0	0	4	0	0	0
10487000	The Bank of Landisburg	4	4	0	4	0	0	0	0
50317400	Peoples Advantage FCU	4	4	0	0	0	0	4	0
10448400	The Sherwood State Bank	4	4	0	0	4	0	0	0
98063852	Bucks County Bank	4	4	0	4	0	0	0	0
50191930	Wepeco FCU	4	4	1	0	0	3	0	0
30014110	Belmont Savings Bank	4	4	0	0	4	0	0	0
50279400	PPG & Associates FCU	4	4	0	4	0	0	0	0
97904196	Clarion County Community Bank	4	4	0	4	0	0	0	0
30039010	The Home Loan Savings Bank	4	4	0	0	4	0	0	0
10599620	The First State Bank	4	4	4	0	0	0	0	0
50351790	Veritas FCU	4	1	0	0	0	0	0	1

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10215800	Citizens Bank & Trust Company	4	4	0	0	0	0	0	4
97449690	United Community Bank of West Kentucky, Inc.	4	4	0	0	0	0	0	4
10223200	Springfield State Bank	4	4	0	0	0	0	0	4
10603480	Cornerstone Bank, Inc.	4	4	4	0	0	0	0	0
50335860	Beach Municipal FCU	4	4	0	0	0	0	4	0
50274000	Frick Tri-County FCU	4	4	0	4	0	0	0	0
98075018	United Citizens Bank of Southern Kentucky, Inc.	4	4	0	0	0	0	0	4
10602160	Mountain Valley Bank, National Association	4	4	4	0	0	0	0	0
10445380	Osgood State Bank	4	4	0	0	4	0	0	0
10498380	Community First Bank	4	4	0	4	0	0	0	0
50318200	Martinsville DuPont Empl CU Inc d/b/a ValleyStar CU	4	4	0	0	0	0	4	0
10580020	Lee Bank & Trust Co.	4	4	0	0	0	0	4	0
30002990	William Penn Bank	4	4	0	4	0	0	0	0
50257080	IH CU, Inc.	4	4	0	0	4	0	0	0
50318710	PortAlliance FCU	4	4	0	0	0	0	4	0
30047160	Coatesville Savings Bank	4	4	0	4	0	0	0	0
50319150	Partners Financial FCU	4	4	0	0	0	0	4	0
50263830	University of Toledo FCU	4	4	0	0	4	0	0	0
50272470	Diamond Credit Union	4	4	0	4	0	0	0	0
50250800	Abbey CU Inc	4	4	0	0	4	0	0	0
50282090	Transit Workers FCU	4	4	0	4	0	0	0	0
50190600	HAR-Co CU	4	4	0	0	0	4	0	0
10218340	Commonwealth Community Bank, Inc.	4	4	0	0	0	0	0	4
30904590	National Cooperative Bank, National Association	4	4	0	0	4	0	0	0
10602060	Community Bank of Parkersburg	4	4	4	0	0	0	0	0
10221260	The Farmers Bank	4	4	0	0	0	0	0	4
97347306	Main Street Bank Corp.	4	4	4	0	0	0	0	0
50252670	Community One CU of Ohio	4	4	0	0	4	0	0	0
10217040	Elkton Bank & Trust Company	4	4	0	0	0	0	0	4
50170570	Partners 1st FCU	4	1	0	0	0	0	1	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
30045970	United Midwest Savings Bank	4	3	0	0	3	0	0	0
50270750	Westmoreland Community FCU	4	4	0	4	0	0	0	0
50261470	Fremont FCU	4	4	0	0	4	0	0	0
50325760	West Virginia FCU	4	4	4	0	0	0	0	0
10478080	Centric Bank	4	4	0	4	0	0	0	0
50278760	Pennsylvania State Empl CU	4	4	0	4	0	0	0	0
30014090	Cincinnati Federal	4	4	0	0	4	0	0	0
10600840	Calhoun County Bank	4	4	4	0	0	0	0	0
10601140	Pioneer Community Bank, Inc.	4	4	4	0	0	0	0	0
50259140	Aurgroup Financial CU	4	4	0	0	4	0	0	0
50280020	U F C W Community FCU	4	4	0	4	0	0	0	0
50342830	Johns Hopkins FCU	4	4	0	0	0	4	0	0
10215900	Farmers Deposit Bank	4	4	0	0	0	0	0	4
10220200	Farmers Bank & Trust Company	4	4	0	0	0	0	0	4
50359600	Twin Oaks FCU	4	4	4	0	0	0	0	0
30048590	Hatboro Federal Savings	4	4	0	4	0	0	0	0
50213530	West Financial CU	4	1	0	0	0	0	1	0
98075264	1st Trust Bank, Inc.	4	4	0	0	0	0	0	4
50264070	North Coast CU	4	4	0	0	4	0	0	0
50252660	Canton School Empl FCU	4	4	0	0	4	0	0	0
50283460	Vantage Trust FCU	4	4	0	4	0	0	0	0
50336440	CHROME FCU	4	4	0	4	0	0	0	0
50276190	Lanco FCU	4	4	0	4	0	0	0	0
98443244	Noah Bank	4	1	0	1	0	0	0	0
10602280	BCBank, Inc	4	4	4	0	0	0	0	0
50283310	Wheatland FCU	4	4	0	4	0	0	0	0
50283350	White Rose CU	4	4	0	4	0	0	0	0
10219640	First National Bank and Trust	4	4	0	0	0	0	0	4
50359210	The United FCU	4	4	2	2	0	0	0	0
10452600	The Citizens National Bank of Woodsfield	4	4	0	0	4	0	0	0



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50191000	Freedom of Maryland FCU	4	4	0	0	0	4	0	0
50256190	Golden Circle CU Inc	4	4	0	0	4	0	0	0
50318740	NSWC FCU	4	4	0	0	0	0	4	0
50279970	Lancaster Red Rose CU	4	4	0	4	0	0	0	0
50350170	Union Trades FCU	4	4	4	0	0	0	0	0
10220140	Magnolia Bank, Inc.	4	4	0	0	0	0	0	4
96689700	Citizens Commerce National Bank	4	4	0	0	0	0	0	4
30047150	Mercer Savings Bank	4	4	0	0	4	0	0	0
50180370	Ashland CU	4	3	0	0	1	0	0	2
50180400	Autotruck Financial CU	4	4	0	0	0	0	0	4
50360582	S P E FCU	4	4	0	4	0	0	0	0
50269930	Allegent Community FCU	4	4	0	4	0	0	0	0
10602620	FNB Bank, Inc.	4	4	4	0	0	0	0	0
96689404	First United Bank and Trust Company	4	4	0	0	0	0	0	4
50135180	Department of Commerce FCU	4	2	0	0	0	1	1	0
50361214	Central Virginia FCU	4	4	0	0	0	0	4	0
96683866	United Bank of Philadelphia	4	4	0	4	0	0	0	0
10603700	Whitesville State Bank	4	4	4	0	0	0	0	0
10443980	RiverHills Bank	4	4	0	0	4	0	0	0
50191290	Prince George's Community FCU	4	4	0	0	0	4	0	0
10218780	Inez Deposit Bank	4	4	0	0	0	0	0	4
50181760	LouChem FCU	4	4	0	0	0	0	0	4
50182970	Service One CU Inc	4	4	0	0	0	0	0	4
30806520	Brentwood Bank	4	4	0	4	0	0	0	0
50325030	Mountain Heritage FCU	4	4	4	0	0	0	0	0
98251518	HomeTown Bank	4	4	0	0	0	0	4	0
50349030	Ohio HealthCare FCU	4	4	0	0	4	0	0	0
10215640	Bank of Cadiz and Trust Company	4	4	0	0	0	0	0	4
30039170	Peoples Federal Savings & Loan Association	4	4	0	0	4	0	0	0
10215980	Kentucky Farmers Bank Corporation	3	3	0	0	0	0	0	3

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30008660	Harrison Building & Loan Association	3	3	0	0	3	0	0	0
30040130	Southern Hills Community Bank	3	3	0	0	3	0	0	0
50279040	Media Members FCU	3	3	0	3	0	0	0	0
10215820	Taylor County Bank	3	3	0	0	0	0	0	3
10222380	The First National Bank of Russell Springs	3	3	0	0	0	0	0	3
97365464	The Freedom Bank of Virginia	3	3	0	0	0	0	3	0
30008270	The Covington Savings & Loan Association	3	3	0	0	3	0	0	0
10220380	Bank of Maysville	3	3	0	0	0	0	0	3
10221540	Owingsville Banking Company	3	3	0	0	0	0	0	3
50253160	CINCO Family Financial Center CU, Inc.	3	3	0	0	3	0	0	0
10603080	Miners & Merchants Bank	3	3	2	0	0	1	0	0
30901440	Madison Bank of Maryland	3	3	0	0	0	3	0	0
50316890	Chesterfield FCU	3	3	0	0	0	0	3	0
30030430	New Carlisle Federal Savings Bank	3	3	0	0	3	0	0	0
50262530	Softite Community FCU	3	3	0	0	3	0	0	0
50251060	FirstEnergy Family CU	3	3	0	0	3	0	0	0
50318360	N A E FCU	3	3	0	0	0	0	3	0
10219400	Lewisburg Banking Company	3	3	0	0	0	0	0	3
50254830	Eaton Family CU	3	2	0	0	2	0	0	0
10443860	The Peoples Savings Bank	3	3	0	0	3	0	0	0
50278370	Pennsylvania Central FCU	3	3	0	3	0	0	0	0
50278650	Penn Wilco FCU	3	3	0	3	0	0	0	0
50182170	Owensboro FCU	3	3	0	0	0	0	0	3
50258830	Miami University Community FCU	3	3	0	0	3	0	0	0
50259690	Ohio University CU Inc	3	3	0	0	3	0	0	0
50280040	Riverfront FCU	3	3	0	3	0	0	0	0
10220440	Jackson County Bank	3	3	0	0	0	0	0	3
96793927	Capital Bank, National Association	3	2	0	0	0	2	0	0
50270530	United Community FCU	3	3	0	3	0	0	0	0
50253770	Impact CU, Inc.	3	3	0	0	3	0	0	0

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50253960	Columbus Metro FCU	3	3	0	0	3	0	0	0
10602760	The Pleasants County Bank	3	3	3	0	0	0	0	0
50274920	Tri Boro FCU	3	3	0	3	0	0	0	0
50134770	AFL-CIO Empl FCU	3	1	0	0	0	1	0	0
50270990	First Choice FCU	3	3	0	3	0	0	0	0
50262860	Bridge CU, Inc.	3	3	0	0	3	0	0	0
50282520	Greater Pittsburgh FCU	3	3	0	3	0	0	0	0
50283170	West-Aircomm FCU	3	3	0	3	0	0	0	0
30037640	Doolin Security Savings Bank, FSB	3	3	3	0	0	0	0	0
10441320	The Fahey Banking Company	3	3	0	0	3	0	0	0
50255180	United Methodist Financial CU	3	3	0	0	3	0	0	0
10436480	Community First Bank, N.A.	3	3	0	0	3	0	0	0
50349700	ProMedica FCU	3	3	0	0	3	0	0	0
96787666	Nationwide Bank	3	3	0	0	3	0	0	0
96788202	Stonebridge Bank	3	3	0	2	0	1	0	0
50359922	Commodore Perry FCU	3	3	0	0	3	0	0	0
30049840	Hometown Bank	3	3	0	0	3	0	0	0
98011604	Meridian Bank	3	3	0	3	0	0	0	0
10602940	First Neighborhood Bank, Inc.	3	3	3	0	0	0	0	0
50339280	Lake Chem Community FCU	3	3	0	0	0	0	0	3
50273680	Tri County Area FCU	3	3	0	3	0	0	0	0
50274800	Hershey FCU	3	3	0	3	0	0	0	0
10429820	The Baltic State Bank	3	3	0	0	3	0	0	0
10603720	The First National Bank of Williamson	3	3	2	0	0	0	0	1
10479880	Elderton State Bank	3	3	0	3	0	0	0	0
50316880	Connects FCU	3	3	0	0	0	0	3	0
50275610	G.A.P. FCU	3	3	0	3	0	0	0	0
50134880	Constellation FCU	3	3	0	0	0	2	1	0
50316540	Arlington Community FCU	3	3	0	0	0	0	3	0
50316720	Bronco FCU	3	3	0	0	0	0	3	0

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50271250	PACE Resources FCU	3	3	0	3	0	0	0	0
50281620	Superior Credit Union	3	3	0	3	0	0	0	0
50318520	Hopewell Chemical FCU	3	3	0	0	0	0	3	0
10218900	Citizens Bank & Trust Co. of Jackson	3	3	0	0	0	0	0	3
10447800	The First Central National Bank of St Paris	3	3	0	0	3	0	0	0
50255160	Midwest Community FCU	3	3	0	0	3	0	0	0
50181220	Green River Area FCU	3	3	0	0	0	0	0	3
50181840	Louisville Metro Police Officers CU	3	3	0	0	0	0	0	3
99104812	Oak View National Bank	3	3	0	0	0	0	3	0
50324940	Universal FCU	3	3	3	0	0	0	0	0
10600640	The Fayette County National Bank of Fayetteville	3	3	3	0	0	0	0	0
50182490	Cove FCU	3	3	0	0	0	0	0	3
50257310	Jeep Country FCU	3	3	0	0	3	0	0	0
30056660	Greenville Savings Bank	3	3	0	3	0	0	0	0
99025216	Virginia Partners Bank	3	3	0	0	0	0	3	0
50180720	Class Act FCU	3	3	0	0	0	0	0	3
10214720	Citizens Deposit Bank	3	3	0	0	0	0	0	3
10216300	Bank of Columbia	3	3	0	0	0	0	0	3
50136350	Transit Empl FCU	3	1	0	0	0	0	1	0
97708416	Victory Community Bank	3	3	0	0	0	0	0	3
50319000	Park View FCU	3	3	0	0	0	0	3	0
10443200	The Peoples National Bank of Mount Pleasant	3	3	0	0	3	0	0	0
50270170	New Alliance FCU	3	3	0	3	0	0	0	0
50253200	Cincinnati Interagency FCU	3	3	0	0	3	0	0	0
50283720	Heritage Valley FCU	3	3	0	3	0	0	0	0
10218040	The Commercial Bank of Grayson	3	3	0	0	0	0	0	3
30004580	Kentucky Federal Savings & Loan Association	3	3	0	0	0	0	0	3
50189900	Baltimore County Empl FCU	3	3	0	0	0	3	0	0
50275600	GNC Community FCU	3	3	0	3	0	0	0	0
30026010	Iron Workers Savings Bank	3	3	0	3	0	0	0	0

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50283410	W-BEE FCU	3	3	0	3	0	0	0	0
50318450	Virginia Educators' CU	3	3	0	0	0	0	3	0
10218940	Bank of Jamestown	3	3	0	0	0	0	0	3
30036920	Monroe Federal Savings & Loan Association	3	3	0	0	3	0	0	0
10447740	The St. Henry Bank	3	3	0	0	3	0	0	0
10448680	Commodore Bank	3	3	0	0	3	0	0	0
10449660	The First National Bank of Sycamore	3	3	0	0	3	0	0	0
30003110	Fairfield Federal Savings & Loan Association	3	3	0	0	3	0	0	0
50260790	Erie Community FCU	3	3	0	0	3	0	0	0
50261560	Saints Margaret & Gregory FCU	3	3	0	0	3	0	0	0
10492220	UNB Bank	3	3	0	3	0	0	0	0
50324900	First Priority FCU	3	3	2	0	0	0	0	1
30803700	Miami Savings Bank	3	3	0	0	3	0	0	0
30057520	People's First Savings Bank	3	3	0	0	3	0	0	0
50318810	Virginia Beach Schools FCU	3	3	0	0	0	0	3	0
10215040	Bedford Loan & Deposit Bank	3	3	0	0	0	0	0	3
50360624	Cornerstone FCU	3	3	0	3	0	0	0	0
10223650	Pinnacle Bank, Inc.	3	3	0	0	0	0	0	3
50263960	Lakeview FCU	3	3	0	0	3	0	0	0
50252980	Champion CU Inc	3	3	0	0	3	0	0	0
10603100	The Bank of Monroe	3	3	3	0	0	0	0	0
50335870	P.W.C. Empl CU	3	3	0	0	0	0	3	0
30021230	Conneaut Savings Bank	3	3	0	1	2	0	0	0
10602260	The First National Bank of Peterstown	3	3	2	0	0	0	1	0
10445880	The Pataskala Banking Company	3	3	0	0	3	0	0	0
30012600	CFBank, National Association	3	3	0	0	3	0	0	0
50262820	Stark FCU	3	3	0	0	3	0	0	0
50282510	Penn State FCU	3	3	0	3	0	0	0	0
50192020	Mid-Atlantic FCU	3	3	0	0	0	3	0	0
50318420	Northern Star CU, Inc.	3	3	0	0	0	0	3	0

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10218860	First State Bank	3	3	0	0	0	0	0	3
10440940	The Bank of Magnolia Company	3	3	0	0	3	0	0	0
10442120	Farmers & Merchants Bank	3	3	0	0	3	0	0	0
50325790	Tin Mill Empl FCU	3	3	2	0	1	0	0	0
50325850	Peoples FCU	3	3	3	0	0	0	0	0
10600340	Bank of Mount Hope, Inc	3	3	3	0	0	0	0	0
10600480	Davis Trust Co.	3	3	3	0	0	0	0	0
10601120	Putnam County Bank	3	3	3	0	0	0	0	0
10601840	First Peoples Bank, Inc.	3	3	3	0	0	0	0	0
50181830	Beacon Community CU	3	3	0	0	0	0	0	3
50258530	Friends and Family CU	3	3	0	0	3	0	0	0
50258710	Medina County FCU	3	3	0	0	3	0	0	0
10437060	The Peoples Bank	3	3	0	0	3	0	0	0
10438380	The Hicksville Bank	3	2	0	0	2	0	0	0
50325270	Morgantown A E S FCU	3	3	3	0	0	0	0	0
30805350	Port Richmond Savings	3	3	0	3	0	0	0	0
50259090	Faith Community United CU Inc.	3	3	0	0	3	0	0	0
50259650	First Service FCU	3	3	0	0	3	0	0	0
30053370	Eagle Savings Bank	3	3	0	0	3	0	0	0
50180340	Members Choice CU	3	3	0	0	0	0	0	3
10215390	Meade County Bank	3	3	0	0	0	0	0	3
10215440	Bank of Edmonson County	3	3	0	0	0	0	0	3
98567446	Select Bank	3	3	0	0	0	0	3	0
50319160	Richmond Virginia Fire Police CU, Inc.	3	3	0	0	0	0	3	0
50253620	Cleveland Self Reliance FCU	3	3	0	0	3	0	0	0
30048560	Sewickley Savings Bank	3	3	0	3	0	0	0	0
50189750	Allegheny County Teachers FCU	3	3	0	0	0	3	0	0
50273970	Freedom United FCU	3	3	0	3	0	0	0	0
50264140	LorMet Community FCU	3	3	0	0	3	0	0	0
30028080	Hancock County Savings Bank, FSB	3	3	3	0	0	0	0	0

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50270030	First Capital FCU	3	3	0	3	0	0	0	0
50252530	Community Star CU, Inc.	3	3	0	0	3	0	0	0
96673581	Synchrony Bank	3	1	0	0	1	0	0	0
50189810	A P L FCU	3	3	0	0	0	3	0	0
50273280	Erie Community CU	3	3	0	3	0	0	0	0
50272850	Century Heritage FCU	3	3	0	3	0	0	0	0
50324500	Charleston Postal FCU	3	3	3	0	0	0	0	0
10451620	The Twin Valley Bank	3	3	0	0	3	0	0	0
50270720	Omega FCU	3	3	0	3	0	0	0	0
96853553	CenterBank	3	3	0	0	3	0	0	0
50251090	Towpath CU	3	3	0	0	3	0	0	0
50283390	Choice One Community FCU	3	3	0	3	0	0	0	0
50191350	Point Breeze CU	3	3	0	0	0	3	0	0
50318560	Prime Care CU	3	3	0	0	0	0	3	0
30801840	Carroll Community Bank	3	3	0	0	0	3	0	0
50258490	Marion Community CU, Inc	3	3	0	0	3	0	0	0
50279480	Riverset CU	3	3	0	3	0	0	0	0
30010160	Cincinnatus Savings & Loan Company	3	3	0	0	3	0	0	0
10223900	Bank of the Mountains, Inc.	3	3	0	0	0	0	0	3
50359648	Element FCU	3	3	3	0	0	0	0	0
50271470	C-B-W Schools FCU	2	2	0	2	0	0	0	0
10528330	People's Bank and Trust Company of Pickett County	2	1	0	0	0	0	0	1
50263230	Taleris CU Inc	2	2	0	0	2	0	0	0
50191500	St. Agnes FCU	2	2	0	0	0	2	0	0
50317560	Front Royal FCU	2	2	0	0	0	0	2	0
10446740	Home National Bank	2	2	0	0	2	0	0	0
50255340	Western Region FCU	2	2	0	0	2	0	0	0
10600300	Clay County Bank	2	2	2	0	0	0	0	0
50181700	Greater Kentucky Credit Union	2	2	0	0	0	0	0	2
50258070	Millstream Area CU Inc	2	2	0	0	2	0	0	0

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98764584	Monument Bank	2	2	0	2	0	0	0	0
50349020	Cincinnati Healthcare Associates FCU	2	2	0	0	2	0	0	0
50355910	Franklin-Oil Region CU	2	2	0	2	0	0	0	0
10215280	Farmers State Bank	2	2	0	0	0	0	0	2
10222120	Farmers Bank and Trust Company, Princeton, Kentucky	2	2	0	0	0	0	0	2
96843388	The Glenmede Trust Company, National Association	2	1	0	1	0	0	0	0
10217720	Fredonia Valley Bank	2	2	0	0	0	0	0	2
30903650	Community Savings Bank	2	2	0	0	2	0	0	0
50189980	Atlantic Financial FCU	2	2	0	0	0	2	0	0
50275130	Newell FCU	2	2	0	2	0	0	0	0
50361946	B. Braun FCU	2	2	0	2	0	0	0	0
50270760	Bellco FCU	2	2	0	2	0	0	0	0
30011580	Warsaw Federal Savings & Loan Association of Cincinnati	2	2	0	0	2	0	0	0
50261970	All Saints FCU	2	2	0	0	2	0	0	0
10489100	The National Bank of Malvern	2	2	0	2	0	0	0	0
50282400	SouthWest Communities FCU	2	2	0	2	0	0	0	0
50192050	W S S C FCU	2	2	0	0	0	2	0	0
10218320	Citizens Bank	2	2	0	0	0	0	0	2
10218520	The Citizens Bank	2	2	0	0	0	0	0	2
50254700	Diebold FCU	2	2	0	0	2	0	0	0
10435540	The Edon State Bank Company of Edon, Ohio	2	2	0	0	2	0	0	0
50325410	167th TFR FCU	2	2	2	0	0	0	0	0
10223380	The Peoples Bank	2	2	0	0	0	0	0	2
10223920	Commercial Bank	2	2	0	0	0	0	0	2
50135990	Police FCU	2	1	0	0	0	1	0	0
50136140	Money One FCU	2	2	0	0	0	2	0	0
50319060	First NRV FCU	2	2	0	0	0	0	2	0
50319820	Salem V A Medical Center FCU	2	2	0	0	0	0	2	0
99269080	Bluegrass Community Bank, Inc.	2	2	0	0	0	0	0	2
50263490	Toledo Police FCU	2	2	0	0	2	0	0	0



INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
70009363	CHHE FCU	2	2	2	0	0	0	0	0
70009387	WJC FCU	2	2	0	0	0	0	2	0
70009505	L E O CU	2	2	0	0	2	0	0	0
50269880	Alcose CU	2	2	0	2	0	0	0	0
50270560	West Branch Valley FCU	2	2	0	2	0	0	0	0
50253210	Postal Family CU, Inc	2	2	0	0	2	0	0	0
98502952	Covenant Bank	2	2	0	2	0	0	0	0
50189720	AI Gar FCU	2	2	0	0	0	2	0	0
50273500	Spirit Financial CU	2	2	0	2	0	0	0	0
50273910	Franklin Johnstown FCU	2	2	0	2	0	0	0	0
50316860	Baylands FCU	2	2	0	0	0	0	2	0
10290324	United Bankers' Bank	2	1	0	0	1	0	0	0
50271270	Inspire FCU	2	2	0	2	0	0	0	0
50271400	Beaver Valley FCU	2	2	0	2	0	0	0	0
30032670	Winchester Federal Bank	2	2	0	0	0	0	0	2
50262140	School Empl Lorain County CU Inc	2	2	0	0	2	0	0	0
50262560	Solon/Chagrin Falls FCU	2	2	0	0	2	0	0	0
50251430	A P FCU	2	2	0	0	2	0	0	0
50283330	Valley 1st Community FCU	2	2	0	2	0	0	0	0
10451860	The Union Banking Company	2	2	0	0	2	0	0	0
50191590	Self Reliance Balto FCU	2	1	0	0	0	1	0	0
50317920	KEMBA Roanoke FCU	2	2	0	0	0	0	2	0
10218560	Bank of Hindman	2	2	0	0	0	0	0	2
10219300	The Farmers National Bank of Lebanon	2	2	0	0	0	0	0	2
50254580	Freedom First CU	2	2	0	0	2	0	0	0
50324950	Huntingtonized FCU	2	2	2	0	0	0	0	0
50257580	Lan Fair FCU	2	2	0	0	2	0	0	0
50259700	O D J F S FCU	2	2	0	0	2	0	0	0
50340810	Daviess County Teachers FCU	2	2	0	0	0	0	0	2
96673479	Standing Stone Bank	2	2	0	0	2	0	0	0

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98851930	Frontier Community Bank	2	2	0	0	0	0	2	0
98346672	Bank of Lexington, Inc.	2	2	0	0	0	0	0	2
50351740	Strategic FCU	2	2	0	0	0	0	2	0
50353160	Timberland FCU	2	2	0	2	0	0	0	0
10215940	First National Bank of Kentucky	2	2	0	0	0	0	0	2
98506028	Old Dominion National Bank	2	2	0	0	0	0	2	0
50359230	Washington County Teachers FCU	2	2	0	0	0	2	0	0
50320080	Jackson River Community CU	2	2	0	0	0	0	2	0
97338982	American Founders Bank, Inc.	2	2	0	0	0	0	0	2
50269730	Alcoa Pittsburgh FCU	2	2	0	2	0	0	0	0
50253430	Classic FCU	2	2	0	0	2	0	0	0
50283810	York Educational FCU	2	2	0	2	0	0	0	0
10218020	Peoples Bank	2	2	0	0	0	0	0	2
50336420	P N G Northern FCU	2	2	0	2	0	0	0	0
30058480	E*Trade Bank	2	2	0	0	0	0	2	0
50189990	Destinations CU	2	2	0	0	0	2	0	0
50276840	Luzerne County FCU	2	2	0	2	0	0	0	0
30031360	County Savings Bank	2	2	0	2	0	0	0	0
50260910	Riverview CU Inc	2	2	0	0	2	0	0	0
30060680	The Peoples Savings & Loan Company	2	2	0	0	2	0	0	0
50281090	Mercer County Community FCU	2	2	0	2	0	0	0	0
50324620	Willow Island FCU	2	2	2	0	0	0	0	0
50190150	Cecil County School Empl FCU	2	2	0	0	0	2	0	0
50191130	NARC FCU	2	2	0	0	0	2	0	0
10441200	The Marblehead Bank	2	2	0	0	2	0	0	0
50181810	Louisville Gas and Electric Co CU Inc	2	2	0	0	0	0	0	2
50259340	Hopewell FCU	2	2	0	0	2	0	0	0
96725556	Portage Community Bank	2	2	0	0	2	0	0	0
50318770	Old Dominion Univ CU Inc	2	2	0	0	0	0	2	0
50277670	Parkview Community FCU	2	2	0	2	0	0	0	0

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50278680	Gold CU	2	2	0	2	0	0	0	0
50279470	Mon Valley Community FCU	2	2	0	2	0	0	0	0
50280080	ClearChoice FCU	2	2	0	2	0	0	0	0
98564442	Waterford Bank, National Association	2	2	0	0	2	0	0	0
50319350	Fedstar FCU	2	2	0	0	0	0	2	0
50319810	Dominion Energy CU	2	2	0	0	1	0	1	0
10494080	New Tripoli Bank	2	2	0	2	0	0	0	0
30041320	Peoples Savings & Loan Company	2	2	0	0	2	0	0	0
30016390	Liberty Bank	2	2	0	0	2	0	0	0
50270130	ARC FCU	2	2	0	2	0	0	0	0
50335030	A R H FCU	2	2	0	0	0	0	0	2
50335580	Hill District FCU	2	2	0	2	0	0	0	0
30903880	Adams County Building & Loan Company	2	2	0	0	2	0	0	0
50276620	Local 520 U A FCU	2	2	0	2	0	0	0	0
10429760	The Rockhold, Brown & Company Bank	2	2	0	0	2	0	0	0
50272670	APEX Community FCU	2	2	0	2	0	0	0	0
50260150	Maumee Valley CU	2	2	0	0	2	0	0	0
50263010	Summit FCU	2	2	0	0	2	0	0	0
30061670	Fidelity Savings & Loan Association of Bucks County d/b/a Fidelity Sa	2	2	0	2	0	0	0	0
50280940	N E T FCU	2	2	0	2	0	0	0	0
50282750	The One FCU	2	2	0	2	0	0	0	0
50324450	Cha Tel FCU	2	2	2	0	0	0	0	0
50190040	Boyds FCU	2	2	0	0	0	2	0	0
50190920	Members First of Maryland FCU	2	2	0	0	0	2	0	0
50191050	Montgomery County Empl FCU	2	2	0	0	0	2	0	0
50318460	Newport News Municipal Empl CU Inc	2	2	0	0	0	0	2	0
10218920	The First National Bank of Jackson	2	2	0	0	0	0	0	2
10448960	The Farmers Savings Bank	2	2	0	0	2	0	0	0
10441800	The Citizens National Bank of McConnelsville	2	2	0	0	2	0	0	0
50182450	Rural Cooperatives CU Inc	2	2	0	0	0	0	0	2

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50257700	L C E FCU	2	2	0	0	2	0	0	0
50257920	TopMark FCU	2	2	0	0	2	0	0	0
30018300	Home City Federal Savings Bank of Springfield	2	2	0	0	2	0	0	0
97899888	New Life FCU	2	2	0	2	0	0	0	0
50180660	Chemco FCU	2	2	0	0	0	0	0	2
10214800	Auburn Banking Co.	2	2	0	0	0	0	0	2
50360302	Labor Management FCU	2	2	0	0	0	0	0	2
10220220	The Peoples Bank	2	2	0	0	0	0	0	2
50229630	IRCO Community FCU	2	1	0	1	0	0	0	0
50152930	Education Personnel FCU	2	1	0	1	0	0	0	0
96793990	The Murray Bank	2	2	0	0	0	0	0	2
70009480	Cincinnati Empl CU	2	2	0	0	2	0	0	0
50273780	Armstrong Associates FCU	2	2	0	2	0	0	0	0
50134820	American Chemical Society FCU	2	1	0	0	1	0	0	0
98170366	First Resource Bank	2	2	0	2	0	0	0	0
30035870	Fidelity Federal Savings & Loan Association of Delaware	2	2	0	0	2	0	0	0
50260110	Port Conneaut FCU	2	2	0	0	2	0	0	0
50250860	Acme FCU	2	2	0	0	2	0	0	0
50280950	First Credit Union of Scranton	2	2	0	2	0	0	0	0
50282990	Reliance FCU	2	2	0	2	0	0	0	0
50324240	Alloy FCU	2	2	2	0	0	0	0	0
50324610	CWV TEL FCU	2	2	2	0	0	0	0	0
50324680	Eastern Panhandle FCU	2	2	2	0	0	0	0	0
50317350	Healthcare Systems FCU	2	2	0	0	0	0	2	0
50317490	Fort Lee FCU	2	2	0	0	0	0	2	0
50254940	East Ohio Gas Cleveland Operating Empl FCU	2	2	0	0	2	0	0	0
50255930	Emerald CU, Inc.	2	2	0	0	2	0	0	0
30042870	American Savings Bank	2	2	0	0	2	0	0	0
50325560	One Community FCU	2	2	2	0	0	0	0	0
50326050	West Virginia Central CU	2	2	2	0	0	0	0	0

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10601910	Northern Hancock Bank & Trust Co	2	2	2	0	0	0	0	0
50181450	Kemba Louisville CU Inc	2	2	0	0	0	0	0	2
50181490	Kentucky Empl CU	2	2	0	0	0	0	0	2
50181680	Metro Empl CU, Inc	2	2	0	0	0	0	0	2
50259680	Ohio Teamsters CU Inc	2	2	0	0	2	0	0	0
50279960	Corry FCU	2	2	0	2	0	0	0	0
50345130	Merho FCU	2	2	0	2	0	0	0	0
10215420	The First National Bank of Brooksville	2	2	0	0	0	0	0	2
10216140	Bank of Clarkson	2	2	0	0	0	0	0	2
10222600	The Salyersville National Bank	2	2	0	0	0	0	0	2
30006440	Watch Hill Bank	2	2	0	0	2	0	0	0
10220480	Farmers Deposit Bank	2	2	0	0	0	0	0	2
50136050	FedFinancial FCU	2	2	0	0	0	2	0	0
50269950	Allegheny Kiski Postal FCU	2	2	0	2	0	0	0	0
50252570	Southeastern Ohio CU, Inc	2	2	0	0	2	0	0	0
50253610	Ohio's First Class CU, Inc	2	2	0	0	2	0	0	0
50283500	Horizon FCU	2	2	0	2	0	0	0	0
10603420	The Citizens Bank of Weston	2	2	2	0	0	0	0	0
98504460	Hometown Bank of Pennsylvania	2	2	0	2	0	0	0	0
10475400	Atlantic Community Bankers Bank	2	1	0	1	0	0	0	0
50276390	First Class FCU	2	2	0	2	0	0	0	0
50135190	Department of the Interior FCU	2	1	0	0	0	0	1	0
50361044	Global 1 FCU	2	1	0	1	0	0	0	0
10429160	The Antwerp Exchange Bank Company	2	2	0	0	2	0	0	0
30020760	Brookville Building & Savings Association	2	2	0	0	2	0	0	0
50316740	Mountain Empire FCU	2	2	0	0	0	0	2	0
50272570	Derry Area FCU	2	2	0	2	0	0	0	0
30032800	Ripley Federal Savings Bank	2	2	0	0	2	0	0	0
50262490	Day-Met CU Inc	2	2	0	0	2	0	0	0
50280970	Scranton Times Downtown FCU	2	2	0	2	0	0	0	0

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97708274	Highlands Community Bank	2	2	0	0	0	0	2	0
50190190	Central CU of Maryland Inc	2	2	0	0	0	2	0	0
70009651	The Chesapeake Bank & Trust Company	2	2	0	0	0	2	0	0
50254000	Education First CU	2	2	0	0	2	0	0	0
50256490	Hancock FCU	2	2	0	0	2	0	0	0
50181690	Lexington Postal CU Inc	2	2	0	0	0	0	0	2
30804220	Galion Building & Loan Bank	2	2	0	0	2	0	0	0
50318800	Patent and Trademark Office FCU	2	2	0	0	0	0	2	0
50279370	Little Giant FCU	2	2	0	2	0	0	0	0
50280240	Pagoda FCU	2	2	0	2	0	0	0	0
30047890	Investment Savings Bank	2	2	0	2	0	0	0	0
50181070	The Health and Education FCU	2	2	0	0	0	0	0	2
98230714	Benchmark Bank	2	2	0	0	2	0	0	0
50135900	NRL FCU	2	1	0	0	0	0	1	0
50263620	Great Lakes CU, Inc.	2	2	0	0	2	0	0	0
50270000	Lehigh Valley Educators CU	2	2	0	2	0	0	0	0
50252110	Lakeshore Community CU	2	2	0	0	2	0	0	0
30058460	Belpre Savings Bank	2	2	0	0	2	0	0	0
50273250	Americo FCU	2	2	0	2	0	0	0	0
50317150	Summit Hampton Roads FCU	2	2	0	0	0	0	2	0
96691412	Toledo Urban FCU	2	2	0	0	2	0	0	0
50271620	Grove City Area FCU	2	2	0	2	0	0	0	0
50251030	BFG FCU	2	2	0	0	2	0	0	0
50251040	Akron Firefighters' CU	2	2	0	0	2	0	0	0
10451280	The Waterford Commercial & Savings Bank	2	2	0	0	2	0	0	0
50190510	Fort Meade Community CU	2	2	0	0	0	2	0	0
10219480	Bank of the Bluegrass & Trust Company	2	2	0	0	0	0	0	2
10442100	The Metamora State Bank	2	2	0	0	2	0	0	0
10440360	The Citizens Bank of Logan	2	2	0	0	2	0	0	0
50325470	Members Choice WV FCU	2	2	2	0	0	0	0	0

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50325590	Ravenswood FCU	2	2	2	0	0	0	0	0
50318950	Portsmouth VA City Empl FCU	2	2	0	0	0	0	2	0
50278010	North East Welch FCU	2	1	0	1	0	0	0	0
50278510	P C FCU	2	2	0	2	0	0	0	0
50279240	West Penn P&P FCU	2	2	0	2	0	0	0	0
50341050	Highway FCU	2	2	0	2	0	0	0	0
50344440	Hopkins County Teachers FCU	2	2	0	0	0	0	0	2
99137296	Cornerstone Bank, National Association	2	2	0	0	0	0	2	0
50348830	Genesis Empl CU	2	2	0	0	2	0	0	0
10215520	Bank of Buffalo	2	2	0	0	0	0	0	2
10215840	Farmers & Traders Bank of Campton	2	2	0	0	0	0	0	2
10222440	The Sacramento Deposit Bank	2	2	0	0	0	0	0	2
97020996	Citizens Bank of Cumberland County	2	2	0	0	0	0	0	2
10572140	The Blue Grass Valley Bank	2	2	0	0	0	0	2	0
50359680	VA Pittsburgh Empl FCU	2	2	0	2	0	0	0	0
50320010	Augusta Health Care CU, Inc.	2	2	0	0	0	0	2	0
50275150	Community Regional CU	2	2	0	2	0	0	0	0
50275540	Friendly FCU	2	2	0	2	0	0	0	0
30044680	The Peoples Savings Bank	2	2	0	0	2	0	0	0
50361836	Tri State Rail FCU	2	2	0	2	0	0	0	0
50362002	Guthrie FCU	2	2	0	2	0	0	0	0
10603760	Williamstown Bank, Inc.	2	2	2	0	0	0	0	0
50274480	Allegheny Valley FCU	1	1	0	1	0	0	0	0
50275620	Johnstown School Empl FCU	1	1	0	1	0	0	0	0
50275680	Galaxy FCU	1	1	0	1	0	0	0	0
50275750	Kase FCU	1	1	0	1	0	0	0	0
50361900	People's Choice FCU	1	1	0	1	0	0	0	0
50362020	Trouville FCU	1	1	0	1	0	0	0	0
98633502	The Victory Bank	1	1	0	1	0	0	0	0
96673037	Mosaic FCU	1	1	0	0	0	0	1	0

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30001110	Slovenian Savings & Loan Association of Canonsburg, PA	1	1	0	1	0	0	0	0
98443644	Resolute Bank	1	1	0	0	1	0	0	0
30035510	Van Wert Federal Savings Bank	1	1	0	0	1	0	0	0
50261740	St. Paschal Baylon Parish FCU	1	1	0	0	1	0	0	0
50262540	Bay Area CU Inc	1	1	0	0	1	0	0	0
50262670	Edison CU	1	1	0	0	1	0	0	0
30063900	North Arundel Savings Bank	1	1	0	0	0	1	0	0
98071740	Maryland Financial Bank	1	1	0	0	0	1	0	0
50281380	S S Peter & Paul FCU	1	1	0	1	0	0	0	0
50281950	Titan FCU	1	1	0	1	0	0	0	0
50282570	M E M FCU	1	1	0	1	0	0	0	0
50282710	Boeing Helicopters CU d.b.a BHCU	1	1	0	1	0	0	0	0
50190620	Howard County Education FCU	1	1	0	0	0	1	0	0
50191230	Notre Dame 2901 FCU	1	1	0	0	0	1	0	0
50317570	G E A Empl FCU	1	1	0	0	0	0	1	0
50318000	Kraftsman FCU	1	1	0	0	0	0	1	0
50361744	Blackhawk FCU	1	1	0	1	0	0	0	0
50254210	Wright-Dunbar Area CU, Inc	1	1	0	0	1	0	0	0
50256110	Girard CU Inc	1	1	0	0	1	0	0	0
50256440	AllWealth FCU	1	1	0	0	1	0	0	0
50324870	Hope FCU	1	1	1	0	0	0	0	0
50325100	Local No 317 I A F F CU	1	1	1	0	0	0	0	0
50326190	West Virginia National Guard FCU	1	1	1	0	0	0	0	0
10488200	The First National Bank of Lilly	1	1	0	1	0	0	0	0
50182200	Paducah Teachers FCU	1	1	0	0	0	0	0	1
50257500	Kyger Creek CU Inc	1	1	0	0	1	0	0	0
50257550	Lakewood Fire Fighters CU, Inc.	1	1	0	0	1	0	0	0
50258030	Local 50 Plumbers & Steamfitters FCU	1	1	0	0	1	0	0	0
50258960	Monarch FCU	1	1	0	0	1	0	0	0
50259100	Mt. Zion Woodlawn FCU	1	1	0	0	1	0	0	0



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30055370	Westmoreland Federal Savings & Loan Association	1	1	0	1	0	0	0	0
50277110	McKeesport Congregational FCU	1	1	0	1	0	0	0	0
50277840	Central Valley FCU	1	1	0	1	0	0	0	0
50278410	Pannonia FCU	1	1	0	1	0	0	0	0
50278880	N F G #2 FCU	1	1	0	1	0	0	0	0
50279300	Pittsburgh City Hall Empl FCU	1	1	0	1	0	0	0	0
50280250	Stanwood Area FCU	1	1	0	1	0	0	0	0
50280370	B V A FCU	1	1	0	1	0	0	0	0
96673259	First Miami University Student FCU	1	1	0	0	1	0	0	0
50355940	Monroeville Boro FCU	1	1	0	1	0	0	0	0
50360180	Tri-Valley Service FCU	1	1	0	1	0	0	0	0
30006460	Community Savings	1	1	0	0	1	0	0	0
10220400	Security Bank & Trust Company	1	1	0	0	0	0	0	1
50136530	HEMA FCU	1	1	0	0	0	1	0	0
96793635	Settlers Bank	1	1	0	0	1	0	0	0
50319430	Hampton Roads Catholic FCU	1	1	0	0	0	0	1	0
50319850	Virginia Beach Postal FCU	1	1	0	0	0	0	1	0
50319860	Virginia Boxer FCU	1	1	0	0	0	0	1	0
50263460	Toledo Metro FCU	1	1	0	0	1	0	0	0
50264860	YS FCU	1	1	0	0	1	0	0	0
70008909	Fiafe FCU	1	1	0	0	0	1	0	0
70009218	Paper Converters Local 286/1034 FCU	1	1	0	1	0	0	0	0
70009221	Par-Del Empl FCU	1	1	0	1	0	0	0	0
70009376	Mingo County Education FCU	1	1	1	0	0	0	0	0
50269900	Aliquippa Teachers FCU	1	1	0	1	0	0	0	0
50270310	A P C I FCU	1	1	0	1	0	0	0	0
50270490	Ingersoll-Rand FCU	1	1	0	1	0	0	0	0
50270660	Beaver County Times FCU	1	1	0	1	0	0	0	0
50252060	BSE CU, Inc	1	1	0	0	1	0	0	0
50253600	The Cleveland Police CU Inc	1	1	0	0	1	0	0	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
50283550	W O D FCU	1	1	0	1	0	0	0	0
97449810	None Suffer Lack FCU	1	1	0	0	0	1	0	0
50336410	Craftmaster FCU	1	1	0	1	0	0	0	0
30901650	The Glen Burnie Mutual Savings Bank	1	1	0	0	0	1	0	0
30904200	Quaint Oak Bank	1	1	0	1	0	0	0	0
50273400	Erie T P E FCU	1	1	0	1	0	0	0	0
50262760	Standard Register FCU	1	1	0	0	1	0	0	0
50263000	Sugardale Empl CU Inc	1	1	0	0	1	0	0	0
50135610	Judd's FCU	1	1	0	0	0	1	0	0
50135700	Marriott Empl FCU	1	1	0	0	0	1	0	0
50251050	Akron Municipal Empl CU Inc	1	1	0	0	1	0	0	0
50281610	Central Keystone FCU	1	1	0	1	0	0	0	0
50282230	Central Susquehanna Community FCU	1	1	0	1	0	0	0	0
50282530	U of P FCU	1	1	0	1	0	0	0	0
50282550	Upper Darby Belltelco FCU	1	1	0	1	0	0	0	0
50283040	Allegheny Central Empl FCU	1	1	0	1	0	0	0	0
50324530	City of Fairmont FCU	1	1	1	0	0	0	0	0
50190130	Potomac FCU	1	1	0	0	0	1	0	0
50318160	Lynchburg Municipal Empl FCU	1	1	0	0	0	0	1	0
50318270	Metropolitan Church FCU	1	1	0	0	0	0	1	0
10219280	The Citizens National Bank of Lebanon	1	1	0	0	0	0	0	1
70009669	Community Bankers' Bank	1	1	0	0	0	0	1	0
30905818	The Wilmington Savings Bank	1	1	0	0	1	0	0	0
50255400	Fasson Empl FCU	1	1	0	0	1	0	0	0
50255500	Whitewater Community CU	1	1	0	0	1	0	0	0
10438900	Independence Bank	1	1	0	0	1	0	0	0
50324850	Joy Empl FCU	1	1	0	0	0	0	1	0
70008476	Metro Wire FCU	1	1	0	1	0	0	0	0
50181900	Louvah FCU	1	1	0	0	0	0	0	1
50182720	Tayco Empl FCU	1	1	0	0	0	0	0	1

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
50258620	McDonald Community FCU	1	1	0	0	1	0	0	0
50277090	McKeesport Area Public School Empl FCU	1	1	0	1	0	0	0	0
50277540	Mount Carmel Baptist FCU	1	1	0	1	0	0	0	0
50278050	Northampton Area School District Empl CU	1	1	0	1	0	0	0	0
50278350	P A A C Transit Division FCU	1	1	0	1	0	0	0	0
50278640	Penn Trafford School Empl FCU	1	1	0	1	0	0	0	0
50278810	Peoples Natural Gas General Office Empl FCU	1	1	0	1	0	0	0	0
50279080	Philadelphia Post Office Empl CU	1	1	0	1	0	0	0	0
50280640	Pittsburgh FCU	1	1	0	1	0	0	0	0
50280680	St. Norbert's Parish CU	1	1	0	1	0	0	0	0
50344450	Kraftcor FCU	1	1	0	0	0	0	0	1
50347170	C C M H FCU	1	1	1	0	0	0	0	0
50354000	Reading FCU	1	1	0	0	1	0	0	0
50354850	Pennsylvania-American Water FCU	1	1	0	1	0	0	0	0
10216200	Clinton Bank	1	1	0	0	0	0	0	1
50360258	CONSOL Empl CU	1	1	0	1	0	0	0	0
30008240	Citizens Federal Savings & Loan Association	1	1	0	0	1	0	0	0
30040690	Carrollton Federal Bank	1	1	0	0	0	0	0	1
98568382	Chain Bridge Bank, National Association	1	1	0	0	0	0	1	0
96672620	The Haverford Trust Company	1	1	0	1	0	0	0	0
96692621	American Bank	1	1	0	1	0	0	0	0
50319390	St. Ann's Arlington FCU	1	1	0	0	0	0	1	0
50319680	Vantage Point FCU	1	1	0	0	0	0	1	0
50319930	Virginia State University FCU	1	1	0	0	0	0	1	0
50319950	Virginia Trailways FCU	1	1	0	0	0	0	1	0
50263530	Mercy Health Partners FCU	1	1	0	0	1	0	0	0
50270120	American Pride CU	1	1	0	1	0	0	0	0
50270520	AT&T Empl Pittsburgh PA FCU	1	1	0	1	0	0	0	0
50270570	Bacharach Empl FCU	1	1	0	1	0	0	0	0
50189780	American Hammered FCU	1	1	0	0	0	1	0	0

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50275090	I B E W Local Union 712 FCU	1	1	0	1	0	0	0	0
50275890	Kennafor FCU	1	1	0	1	0	0	0	0
50276230	Latrobe Area Hospital FCU	1	1	0	1	0	0	0	0
50276600	Local 229 I B E W FCU	1	1	0	1	0	0	0	0
50361948	Troy Area School Empl FCU	1	1	0	1	0	0	0	0
96689328	First Baptist Church of Vienna (Va.) FCU	1	1	0	0	0	0	1	0
10430960	The First National Bank of Blanchester	1	1	0	0	1	0	0	0
96673030	P A T A FCU	1	1	0	1	0	0	0	0
50316710	Bristol VA School System FCU	1	1	0	0	0	0	1	0
30034390	Compass Savings Bank	1	1	0	1	0	0	0	0
50277800	New Castle Bellco FCU	1	1	0	1	0	0	0	0
50278170	Penntech Empl FCU	1	1	0	1	0	0	0	0
50279350	Pittsburgh Firefighters FCU	1	1	0	1	0	0	0	0
50280030	Blue Chip FCU	1	1	0	1	0	0	0	0
50280400	R S Bellco FCU	1	1	0	1	0	0	0	0
50280810	Sarco FCU	1	1	0	1	0	0	0	0
50341380	DOY FCU	1	1	0	0	1	0	0	0
50342770	Choptank Electric Co-op FCU	1	1	0	0	0	1	0	0
50344080	Access CU	1	1	0	1	0	0	0	0
30027530	First Federal Savings & Loan Association	1	1	0	0	1	0	0	0
99137534	New Horizon Bank, National Association	1	1	0	0	0	0	1	0
50180570	Brown-Forman Empl CU	1	1	0	0	0	0	0	1
50351120	Delmarva Power Southern Division FCU	1	1	0	0	0	1	0	0
50351270	Wyoming Area FCU	1	1	0	1	0	0	0	0
50353360	Northern Kentucky Educators FCU	1	1	0	0	0	0	0	1
50355320	Friends First CU	1	1	0	0	0	0	0	1
97024750	The Trust Company of Virginia	1	1	0	0	0	0	1	0
50360268	Preston FCU	1	1	1	0	0	0	0	0
50360352	Doe Run FCU	1	1	0	0	0	0	0	1
30065170	First Federal Savings & Loan Association	1	1	0	0	0	0	0	1

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30066390	Homewood Federal Savings Bank	1	1	0	0	0	1	0	0
30008710	Nelsonville Home & Savings	1	1	0	0	1	0	0	0
96843448	Buckeye Community Bank	1	1	0	0	1	0	0	0
50359606	Novamont Empl FCU	1	1	1	0	0	0	0	0
50359674	Martinsburg VA Center FCU	1	1	1	0	0	0	0	0
50319580	Spruance Cellophane CU	1	1	0	0	0	0	1	0
10495900	Brown Brothers Harriman & Co	1	1	0	1	0	0	0	0
97346646	Mount Pleasant Baptist Church FCU	1	1	0	0	0	0	1	0
50263580	Toledo Teamsters FCU	1	1	0	0	1	0	0	0
50263760	Trumbull County Postal Empl CU Inc	1	1	0	0	1	0	0	0
50264440	Wayne County Community FCU	1	1	0	0	1	0	0	0
50264750	Woodco FCU	1	1	0	0	1	0	0	0
50264920	Yorkville Community FCU	1	1	0	0	1	0	0	0
70009190	NU Community CU	1	1	0	1	0	0	0	0
70009357	White Rock FCU	1	1	0	1	0	0	0	0
70009400	West Virginia State Convention CU	1	1	1	0	0	0	0	0
70009421	Star City FCU	1	1	0	0	0	0	1	0
70009451	Yogaville FCU	1	1	0	0	0	0	1	0
70009544	S T O F F E FCU	1	1	0	0	1	0	0	0
50270070	Your Choice FCU	1	1	0	1	0	0	0	0
50270610	Morrison's Cove 1st FCU	1	1	0	1	0	0	0	0
30048930	Home Savings Bank of Wapakoneta	1	1	0	0	1	0	0	0
50283440	Corner Post FCU	1	1	0	1	0	0	0	0
50273820	Fort Ligonier FCU	1	1	0	1	0	0	0	0
50274750	Heights Community FCU	1	1	0	1	0	0	0	0
50274770	Hempfield Area FCU	1	1	0	1	0	0	0	0
50274900	Holy Trinity Baptist FCU	1	1	0	1	0	0	0	0
50274940	Honeywell Philadelphia Division FCU	1	1	0	1	0	0	0	0
50275460	Jessop Community FCU	1	1	0	1	0	0	0	0
50276140	Lancaster (PA) Firemen FCU	1	1	0	1	0	0	0	0

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50276710	UFCW Local 23 FCU	1	1	0	1	0	0	0	0
50361788	Glatco CU	1	1	0	1	0	0	0	0
50361798	Phila Gas Works Empl FCU	1	1	0	1	0	0	0	0
50361912	CMC-FCPI Empl FCU	1	1	0	1	0	0	0	0
10430940	The Monitor Bank	1	1	0	0	1	0	0	0
96673046	Mount Jezreel FCU	1	1	0	0	0	1	0	0
50272800	Duq-Lite Empl FCU	1	1	0	1	0	0	0	0
50260120	Greater Wayne Community FCU	1	1	0	0	1	0	0	0
50260680	First Choice Community CU Inc	1	1	0	0	1	0	0	0
50260780	RSC YO/CL Offices FCU	1	1	0	0	1	0	0	0
50261450	St. Joseph FCU	1	1	0	0	1	0	0	0
50261510	Your Legacy FCU	1	1	0	0	1	0	0	0
50261780	St. Paul AME Zion Church CU Inc	1	1	0	0	1	0	0	0
50262110	S.C.F.E. CU Inc	1	1	0	0	1	0	0	0
50346110	General Portland Peninsular Empl FCU	1	1	0	0	1	0	0	0
50346560	C C A C FCU	1	1	0	1	0	0	0	0
50351750	Planters FCU	1	1	0	0	0	0	1	0
10222720	Sebree Deposit Bank	1	1	0	0	0	0	0	1
30069020	First Federal Savings & Loan Association of Morehead	1	1	0	0	0	0	0	1
96793934	The Philadelphia Trust Company	1	1	0	1	0	0	0	0
99978914	Nueva Esperanza Community CU	1	1	0	0	1	0	0	0
50319030	Queen of Peace Arlington FCU	1	1	0	0	0	0	1	0
50264080	UPS CU, Inc	1	1	0	0	1	0	0	0
50264710	Wiremens CU, Inc	1	1	0	0	1	0	0	0
70009083	Eme CU	1	1	0	1	0	0	0	0
70009129	IUPAT D.C. 21	1	1	0	1	0	0	0	0
70009168	I C FCU	1	1	0	1	0	0	0	0
70009378	Natrium Empl FCU	1	1	1	0	0	0	0	0
70009395	Teamsters Local 697 FCU	1	1	1	0	0	0	0	0
50270640	Beaver Avenue FCU	1	1	0	1	0	0	0	0

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50253050	Children's Medical Center FCU	1	1	0	0	1	0	0	0
50253380	Civil Service Empl Association CU Inc	1	1	0	0	1	0	0	0
50253520	Cleveland Heights Teachers CU Inc	1	1	0	0	1	0	0	0
50273420	E R R L FCU	1	1	0	1	0	0	0	0
50273530	Fayette County School Empl CU	1	1	0	1	0	0	0	0
50273540	Fayette Federal Empl FCU	1	1	0	1	0	0	0	0
50273790	Latrobe FCU	1	1	0	1	0	0	0	0
50274210	Glass Cap FCU	1	1	0	1	0	0	0	0
50274240	Lonza FCU	1	1	0	1	0	0	0	0
50275980	K G C FCU	1	1	0	1	0	0	0	0
50276000	Kit Tel FCU	1	1	0	1	0	0	0	0
50276740	Locomotive & Control Empl FCU	1	1	0	1	0	0	0	0
50361840	Riverside Beaver County FCU	1	1	0	1	0	0	0	0
30026440	Perpetual Federal Savings Bank	1	1	0	0	1	0	0	0
50134940	B N A FCU	1	1	0	0	0	0	1	0
50360772	The State CU	1	1	1	0	0	0	0	0
10431900	The Farmers & Merchants Bank	1	1	0	0	1	0	0	0
98716312	Community Capital Bank of Virginia	1	1	0	0	0	0	1	0
30020070	Milton Savings Bank	1	1	0	1	0	0	0	0
50316430	AB & W CU, Inc.	1	1	0	0	0	0	1	0
50316730	Brunswick County Teachers FCU	1	1	0	0	0	0	1	0
50316810	Celco Community FCU	1	1	0	0	0	0	1	0
50272410	Oil Country FCU	1	1	0	1	0	0	0	0
50260330	Plumbers 55 FCU	1	1	0	0	1	0	0	0
50261410	St. James Parish CU	1	1	0	0	1	0	0	0
50262570	Sorg-Bay West FCU	1	1	0	0	1	0	0	0
50263200	Teamsters Local 92 FCU	1	1	0	0	1	0	0	0
30063510	Jarrettsville Federal Savings & Loan Association	1	1	0	0	0	1	0	0
50281230	S R U FCU	1	1	0	1	0	0	0	0
50281800	Team First FCU	1	1	0	1	0	0	0	0

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50282980	Discovery FCU	1	1	0	1	0	0	0	0
50283110	West York Area School District Empl FCU	1	1	0	1	0	0	0	0
50190580	Greenbelt FCU	1	1	0	0	0	1	0	0
50190880	Local 355 Maryland FCU	1	1	0	0	0	1	0	0
50191010	M B F T FCU	1	1	0	0	0	1	0	0
50191030	M N C P P C FCU	1	1	0	0	0	1	0	0
10446860	The Republic Banking Company	1	1	0	0	1	0	0	0
50254310	R T A Brooklyn FCU	1	1	0	0	1	0	0	0
50254710	Dillonvale FCU	1	1	0	0	1	0	0	0
30043640	MidState Community Bank	1	1	0	0	0	1	0	0
50325230	Mercer County West Virginia Teachers FCU	1	1	1	0	0	0	0	0
50325670	South Charleston Empl FCU	1	1	1	0	0	0	0	0
50181790	Louisville Federal CU Inc	1	1	0	0	0	0	0	1
50182030	Modern Empl FCU	1	1	0	0	0	0	0	1
50258000	Goodyear Empl CU Inc	1	1	0	0	1	0	0	0
50258160	Local #673 CU, Inc	1	1	0	0	1	0	0	0
50258890	Middletown Area Schools CU	1	1	0	0	1	0	0	0
50259400	North Olmsted School Empl FCU	1	1	0	0	1	0	0	0
50262220	Sylvania Area FCU	1	1	0	0	1	0	0	0
50262400	Sherchem FCU	1	1	0	0	1	0	0	0
50262870	State Highway Patrol FCU	1	1	0	0	1	0	0	0
50262980	Struthers FCU	1	1	0	0	1	0	0	0
50281140	S I Philadelphia FCU	1	1	0	1	0	0	0	0
50281240	S M FCU	1	1	0	1	0	0	0	0
50281360	Springdale P P G FCU	1	1	0	1	0	0	0	0
50281460	State College FCU	1	1	0	1	0	0	0	0
50282030	Lake Erie Community FCU	1	1	0	1	0	0	0	0
50283300	Westmoreland Water FCU	1	1	0	1	0	0	0	0
50283400	CityMark FCU	1	1	0	1	0	0	0	0
50324300	Raleigh County FCU	1	1	1	0	0	0	0	0



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50358290	M G Empl FCU	1	1	0	0	1	0	0	0
10451980	The National Bank of Adams County of West Union	1	1	0	0	1	0	0	0
50190770	KELCO FCU	1	1	0	0	0	1	0	0
50190980	LM FCU	1	1	0	0	0	1	0	0
50191520	St. Joseph Medical Center MD FCU	1	1	0	0	0	1	0	0
50191790	Triple C 16 FCU	1	1	0	0	0	1	0	0
50191990	B E E FCU	1	1	0	0	0	1	0	0
50192040	W R Grace Maryland Empl FCU	1	1	0	0	0	1	0	0
98382208	E*Trade Savings Bank	1	1	0	0	0	0	1	0
50317780	High Street Baptist Church FCU	1	1	0	0	0	0	1	0
50317910	Hampton Veterans Affairs FCU	1	1	0	0	0	0	1	0
50318440	N C S E CU Inc	1	1	0	0	0	0	1	0
30036810	The Home Savings & Loan Company of Kenton	1	1	0	0	1	0	0	0
30037760	Second Federal Savings & Loan Association of Philadelphia	1	1	0	1	0	0	0	0
30038810	Martinsville First Savings Bank	1	1	0	0	0	0	1	0
50254950	East Ohio Gas Youngstown Division Empl FCU	1	1	0	0	1	0	0	0
50255820	SMART FCU	1	1	0	0	1	0	0	0
50256260	Gorman-Rupp & Associates CU Inc d/b/a GROhio Community CU	1	1	0	0	1	0	0	0
50256740	Holy Family Parma FCU	1	1	0	0	1	0	0	0
50256780	First Ohio Community FCU	1	1	0	0	1	0	0	0
10434900	Buckeye State Bank	1	1	0	0	1	0	0	0
50324840	Harrison County FCU	1	1	1	0	0	0	0	0
50325000	I B E W 968 FCU	1	1	1	0	0	0	0	0
50325120	O F Toalston FCU	1	1	1	0	0	0	0	0
50325170	McDowell County FCU	1	1	1	0	0	0	0	0
50325400	O C P S FCU	1	1	1	0	0	0	0	0
50325660	United Hospital Center FCU	1	1	1	0	0	0	0	0
50325800	Tri Ag West Virginia FCU	1	1	1	0	0	0	0	0
50325900	US Empl FCU	1	1	1	0	0	0	0	0
50325920	Valley Bell FCU	1	1	1	0	0	0	0	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
50326140	Whetelco FCU	1	1	1	0	0	0	0	0
70008500	Altoona Area Empl FCU	1	1	0	1	0	0	0	0
50181650	Letcher County Teachers CU, Inc	1	1	0	0	0	0	0	1
50182045	M S D FCU	1	1	0	0	0	0	0	1
50182590	Shawnee T V A Empl FCU	1	1	0	0	0	0	0	1
50183000	Whitesville Community CU Inc	1	1	0	0	0	0	0	1
50257520	Lake County Educational FCU	1	1	0	0	1	0	0	0
50257890	Beacon Mutual FCU	1	1	0	0	1	0	0	0
50258290	Credit Union One Inc	1	1	0	0	1	0	0	0
50259020	Morton Salt CU Inc	1	1	0	0	1	0	0	0
50259800	Ohio Operating Engineers FCU	1	1	0	0	1	0	0	0
50259810	Orange School Empl CU Inc	1	1	0	0	1	0	0	0
30053250	Slovak Savings Bank	1	1	0	1	0	0	0	0
50277560	Mt Lebanon FCU	1	1	0	1	0	0	0	0
50278000	North Districts Community CU	1	1	0	1	0	0	0	0
50278090	Pinpoint FCU	1	1	0	1	0	0	0	0
50279410	Greater Pittsburgh Police FCU	1	1	0	1	0	0	0	0
50279420	Post Gazette FCU	1	1	0	1	0	0	0	0
50279500	Keystone United Methodist FCU	1	1	0	1	0	0	0	0
50280060	Reading Berks School Empl CU	1	1	0	1	0	0	0	0
50280300	Dow Bucks County FCU	1	1	0	1	0	0	0	0
50280350	Family 1st FCU	1	1	0	1	0	0	0	0
50324920	Huntington West Virginia Firemen's FCU	1	1	1	0	0	0	0	0
70008503	South Hills Healthcare FCU	1	1	0	1	0	0	0	0
30803730	New Foundation Savings Bank	1	1	0	0	1	0	0	0
50258560	Maumee Educators FCU	1	1	0	0	1	0	0	0
50258870	Butler Heritage FCU	1	1	0	0	1	0	0	0
96725106	Enterprise Bank	1	1	0	1	0	0	0	0
50318900	Poly Scientific Empl FCU	1	1	0	0	0	0	1	0
50277270	Michael Baker International FCU	1	1	0	1	0	0	0	0

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50342860	Capital Area Realtors FCU	1	1	0	0	0	1	0	0
50342870	Baltimore Washington FCU	1	1	0	0	0	1	0	0
50348310	Regional Medical Center of Hopkins Co Empl FCU	1	1	0	0	0	0	0	1
50348490	I U 7 FCU	1	1	0	1	0	0	0	0
10648299	Bank of Bird-In-Hand	1	1	0	1	0	0	0	0
30018340	Valley Central Bank	1	1	0	0	1	0	0	0
96729208	Asian Bank	1	1	0	1	0	0	0	0
50180810	Corning Glass Works Harrodsburg FCU	1	1	0	0	0	0	0	1
50181080	F C I Ashland FCU	1	1	0	0	0	0	0	1
50353580	Back Mountain FCU	1	1	0	1	0	0	0	0
50360276	CAMC FCU	1	1	1	0	0	0	0	0
50360314	Greenup County FCU	1	1	0	0	0	0	0	1
50360380	Ohio Valley FCU	1	1	0	0	1	0	0	0
98506888	CBank	1	1	0	0	1	0	0	0
50136450	Washington Gas Light FCU	1	1	0	0	0	0	1	0
50320020	Waynesboro Empl CU, Inc.	1	1	0	0	0	0	1	0
10574260	First State Bank	1	1	0	0	0	0	1	0
50263430	Toledo Fire Fighters FCU	1	1	0	0	1	0	0	0
50264060	Steel Valley FCU	1	1	0	0	1	0	0	0
50264590	Valley One Community FCU	1	1	0	0	1	0	0	0
10443280	The Mt Victory State Bank	1	1	0	0	1	0	0	0
70008912	Consumer Healthcare FCU	1	1	0	1	0	0	0	0
70008978	Peninsula Genl Hosp & Med Ctr Empl FCU	1	1	0	0	0	1	0	0
70009334	Towanda School Empl FCU	1	1	0	1	0	0	0	0
70009351	Wayland Temple Baptist FCU	1	1	0	1	0	0	0	0
70009427	Loudoun CU	1	1	0	0	0	0	1	0
70009494	Formica-Evendale FCU	1	1	0	0	1	0	0	0
50269740	A C B A FCU	1	1	0	1	0	0	0	0
50270370	Armstrong County Federal Empl FCU	1	1	0	1	0	0	0	0
50251830	New Horizon FCU	1	1	0	0	1	0	0	0

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50251890	Bardes Empl FCU	1	1	0	0	1	0	0	0
50252300	Brewster FCU	1	1	0	0	1	0	0	0
50252390	Materion FCU	1	1	0	0	1	0	0	0
50283660	Wyrope Williamsport FCU	1	1	0	1	0	0	0	0
96684783	Union of Poles in America CU Inc	1	1	0	0	1	0	0	0
50334540	Signature FCU	1	1	0	0	0	0	1	0
30003840	The Pioneer Savings Bank	1	1	0	0	1	0	0	0
50274010	Neighbors 1st FCU	1	1	0	1	0	0	0	0
50274360	Greensburg Teachers CU	1	1	0	1	0	0	0	0
50275400	Jay Bee Empl FCU	1	1	0	1	0	0	0	0
50275940	Philadelphia Letter Carriers FCU	1	1	0	1	0	0	0	0
50276380	Lehigh County Empl FCU	1	1	0	1	0	0	0	0
96672883	University of Pennsylvania Student FCU	1	1	0	1	0	0	0	0
96692199	Metro Bank, Inc.	1	1	0	0	0	0	0	1
50271340	Moonlight CU	1	1	0	1	0	0	0	0
50271360	Butler Co Teachers FCU	1	1	0	1	0	0	0	0
50271390	B V M S N FCU	1	1	0	1	0	0	0	0
50271570	Carnegie Mellon University FCU	1	1	0	1	0	0	0	0
50271810	Cheswick Atomic Division FCU	1	1	0	1	0	0	0	0
50271940	City of McKeesport Empl FCU	1	1	0	1	0	0	0	0
50272830	Financial Advantage FCU	1	1	0	1	0	0	0	0
96673145	The Bankers Bank of Kentucky, Inc	1	1	0	0	0	0	0	1
50261120	Parish FCU	1	1	0	0	1	0	0	0
50261280	St. Colman & Affiliates FCU	1	1	0	0	1	0	0	0
50261300	St. Columbille FCU	1	1	0	0	1	0	0	0
50262070	Sandusky Ohio Edison Empl FCU	1	1	0	0	1	0	0	0
50264460	Whitehall CU	1	1	0	0	1	0	0	0
50264880	Mahoning Valley FCU	1	1	0	0	1	0	0	0
50265020	Youngstown City Schools CU Inc	1	1	0	0	1	0	0	0
98357192	Louisa Community Bank	1	1	0	0	0	0	0	1

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70008918	Bethany Baptist Christian FCU	1	1	0	1	0	0	0	0
70009460	Suncomp Empl FCU	1	1	0	0	0	0	1	0
50269960	Allegheny Ludlum Brackenridge FCU	1	1	0	1	0	0	0	0
50269970	Allegheny Metal FCU	1	1	0	1	0	0	0	0
50270410	Asbestos Workers Local 14 FCU	1	1	0	1	0	0	0	0
50252750	Carmel Brotherhood FCU	1	1	0	0	1	0	0	0
50252890	Dynamic FCU	1	1	0	0	1	0	0	0
50253080	Chivaho FCU	1	1	0	0	1	0	0	0
50253350	Painesville CU	1	1	0	0	1	0	0	0
50253860	Integrity FCU	1	1	0	0	1	0	0	0
50253880	Columbiana County School Empl CU Inc	1	1	0	0	1	0	0	0
50283510	Williamsport Teachers CU	1	1	0	1	0	0	0	0
10216820	Dixon Bank	1	1	0	0	0	0	0	1
97518064	Signature Bank, National Association	1	1	0	0	1	0	0	0
50273700	First PA Twp Emp FCU	1	1	0	1	0	0	0	0
50275080	I B E W Local 56 FCU	1	1	0	1	0	0	0	0
50275310	Irvin Works FCU	1	1	0	1	0	0	0	0
50275710	Blair County FCU	1	1	0	1	0	0	0	0
50276420	Lesco FCU	1	1	0	1	0	0	0	0
50360864	The Way CU Inc	1	1	0	0	1	0	0	0
50361054	Waycose FCU	1	1	1	0	0	0	0	0
50270710	Bedco Hospital FCU	1	1	0	1	0	0	0	0
50271070	Bradford Area School Empl FCU	1	1	0	1	0	0	0	0
50271980	Clarion FCU	1	1	0	1	0	0	0	0
30035420	First Federal Savings & Loan Association of Ravenswood	1	1	1	0	0	0	0	0
96853846	TBC FCU	1	1	0	0	0	0	1	0
50263060	Superior Savings CU	1	1	0	0	1	0	0	0
10493060	The Neffs National Bank	1	1	0	1	0	0	0	0
50135560	I B E W 26 FCU	1	1	0	0	0	1	0	0
98065064	Counsel Trust Company	1	1	0	1	0	0	0	0

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50281400	Pennstar FCU	1	1	0	1	0	0	0	0
50281420	Standard Steel Empl FCU	1	1	0	1	0	0	0	0
50281650	Swindell Dressler CU	1	1	0	1	0	0	0	0
50281730	T C W H No 585 FCU	1	1	0	1	0	0	0	0
50282300	Visionary FCU	1	1	0	1	0	0	0	0
50282620	Utilities Empl CU	1	1	0	1	0	0	0	0
50324230	Alderson F C I FCU	1	1	1	0	0	0	0	0
50324260	Appalachian Power Empl FCU	1	1	1	0	0	0	0	0
50324470	Charleston FCU	1	1	1	0	0	0	0	0
50324520	City of Clarksburg FCU	1	1	1	0	0	0	0	0
50324540	Clarksburg Area Postal Empl FCU	1	1	1	0	0	0	0	0
50324670	Eagle Can Empl FCU	1	1	1	0	0	0	0	0
50358880	Marshall County FCU	1	1	1	0	0	0	0	0
50191090	The Mount Lebanon FCU	1	1	0	0	0	1	0	0
50318310	Midway FCU	1	1	0	0	0	0	1	0
50318570	Norfolk Municipal FCU	1	1	0	0	0	0	1	0
10579100	Farmers & Merchants Bank of Craig County	1	1	0	0	0	0	1	0
30014120	Home Federal Savings & Loan Association of Niles	1	1	0	0	1	0	0	0
50361772	Financial 1st FCU	1	1	0	1	0	0	0	0
50254330	RTA Hayden FCU	1	1	0	0	1	0	0	0
50254450	Dairypak Empl CU Inc	1	1	0	0	1	0	0	0
50254510	Dayton Firefighters FCU	1	1	0	0	1	0	0	0
50255030	Eight FCU	1	1	0	0	1	0	0	0
50255350	Falls Catholic CU, Inc	1	1	0	0	1	0	0	0
50255670	Plain Dealer FCU	1	1	0	0	1	0	0	0
50255970	Geauga CU Inc	1	1	0	0	1	0	0	0
50256580	Harvest FCU	1	1	0	0	1	0	0	0
50256620	Heekin Can Empl CU Inc	1	1	0	0	1	0	0	0
10435100	The Corn City State Bank	1	1	0	0	1	0	0	0
10437340	The First National Bank of Germantown	1	1	0	0	1	0	0	0

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50282810	Wabelco FCU	1	1	0	1	0	0	0	0
50282840	Ward FCU	1	1	0	1	0	0	0	0
50283030	APS FCU	1	1	0	1	0	0	0	0
50283100	Susquehanna Valley FCU	1	1	0	1	0	0	0	0
50283340	White Haven Center Empl FCU	1	1	0	1	0	0	0	0
97582660	Citizens National Bank	1	1	0	0	0	0	1	0
50358830	Knoll Empl CU	1	1	0	1	0	0	0	0
50190310	Dor Wic FCU	1	1	0	0	0	1	0	0
50190460	Ferko Maryland FCU	1	1	0	0	0	1	0	0
50317610	Glamorgan Empl FCU	1	1	0	0	0	0	1	0
50317900	Inland Motors Empl FCU	1	1	0	0	0	0	1	0
50318550	Norfolk Fire Dept FCU	1	1	0	0	0	0	1	0
30904530	Elizabeth Building & Loan Association, Inc.	1	1	0	0	0	0	1	0
50255570	Firestone FCU	1	1	0	0	1	0	0	0
50255800	Members Choice CU, Inc.	1	1	0	0	1	0	0	0
50256700	HTM Area CU	1	1	0	0	1	0	0	0
30042150	SSB Community Bank	1	1	0	0	1	0	0	0
50324890	Huntington C&O Railway Empl FCU	1	1	1	0	0	0	0	0
50324960	I B E W 141 FCU	1	1	1	0	0	0	0	0
50325430	P A C E FCU	1	1	1	0	0	0	0	0
50325770	Telbec FCU	1	1	1	0	0	0	0	0
50325930	Valley Board FCU	1	1	1	0	0	0	0	0
50326200	West Virginia University Empl FCU	1	1	1	0	0	0	0	0
70008520	Fisher Scientific Empl FCU	1	1	0	1	0	0	0	0
50181170	Your Hometown FCU	1	1	0	0	0	0	0	1
50181540	Bluegrass Community FCU	1	1	0	0	0	0	0	1
50181550	K I T FCU	1	1	0	0	0	0	0	1
50182160	Audubon FCU	1	1	0	0	0	0	0	1
30804320	Huntingdon Savings Bank	1	1	0	1	0	0	0	0
30804830	Tioga-Franklin Savings Bank	1	1	0	1	0	0	0	0

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50257400	Kennametal-Orwell Empl FCU	1	1	0	0	1	0	0	0
30054710	Farmers Building and Savings Bank	1	1	0	1	0	0	0	0
50318910	P F D Firefighters CU Inc	1	1	0	0	0	0	1	0
50277900	Kinzua FCU	1	1	0	1	0	0	0	0
50277980	Norristown Bell CU	1	1	0	1	0	0	0	0
50278400	PALCO FCU	1	1	0	1	0	0	0	0
50278450	PHB Empl FCU	1	1	0	1	0	0	0	0
50278560	Penlanco FCU	1	1	0	1	0	0	0	0
50278620	Penn Hills Municipal FCU	1	1	0	1	0	0	0	0
50278710	Pennformer Community FCU	1	1	0	1	0	0	0	0
50279030	Philadelphia Mint FCU	1	1	0	1	0	0	0	0
50280010	UFCW Local 1776 FCU	1	1	0	1	0	0	0	0
50280580	St. Elizabeth CU	1	1	0	1	0	0	0	0
50280670	Saint Nicholas FCU	1	1	0	1	0	0	0	0
50280700	St. Paul's FCU	1	1	0	1	0	0	0	0
98250222	Eclipse Bank	1	1	0	0	0	0	0	1
50349050	Allegheny Health Services Empl FCU	1	1	0	1	0	0	0	0
50349670	PA HealthCare CU	1	1	0	1	0	0	0	0
50350630	Pocono Medical Center FCU	1	1	0	1	0	0	0	0
50350800	Service Station Dealers FCU	1	1	0	1	0	0	0	0
50354860	Ukrainian Selfreliance of Western PA FCU	1	1	0	1	0	0	0	0
50355870	Morrow County FCU	1	1	0	0	1	0	0	0
50360242	Cleveland Church of Christ FCU	1	1	0	0	1	0	0	0
50360308	KUE FCU	1	1	0	0	0	0	0	1
50360322	Morehead Community FCU	1	1	0	0	0	0	0	1
50360608	Port of Hampton Roads I L A FCU	1	1	0	0	0	0	1	0
10221060	Hart County Bank and Trust Company	1	1	0	0	0	0	0	1
96687086	East End Food Cooperative FCU	1	1	0	1	0	0	0	0
97778898	Xenith Bank	1	1	0	0	0	0	1	0
50359318	M S U FCU	1	1	0	0	0	0	0	1



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50319440	St. Thomas More FCU	1	1	0	0	0	0	1	0
50319910	Virginia United Methodist CU, Inc	1	1	0	0	0	0	1	0
50263570	Educational Community Alliance CU	1	1	0	0	1	0	0	0
50263880	U A P Empl FCU	1	1	0	0	1	0	0	0
50280730	St. Vincent Erie FCU	1	1	0	1	0	0	0	0
50342330	Erie City Empl FCU	1	1	0	1	0	0	0	0
50344110	Morning Star Baptist FCU	1	1	0	1	0	0	0	0
50180850	C & O United CU	1	1	0	0	0	0	0	1
50354360	Affiliated Trades CU	1	1	0	1	0	0	0	0
50357230	Community United CU	1	1	0	0	1	0	0	0
97026025	Glenview Trust Company	1	1	0	0	0	0	0	1
50360400	Shacog FCU	1	1	0	1	0	0	0	0
50360544	Valley Pride FCU	1	1	0	1	0	0	0	0
98568904	Columbus First Bank	1	1	0	0	1	0	0	0
10488500	Liverpool Community Bank	1	1	0	1	0	0	0	0
96687412	Credit First National Association	1	1	0	0	1	0	0	0
96687413	FDS Bank	1	1	0	0	1	0	0	0
97818200	First Bank of Charleston, Inc.	1	1	1	0	0	0	0	0
50359638	Wood County Community FCU	1	1	1	0	0	0	0	0
50319200	Credit Union of Richmond, Inc.	1	1	0	0	0	0	1	0
50319210	Richmond Heritage FCU	1	1	0	0	0	0	1	0
50319250	Riverside Health System Empl CU Inc	1	1	0	0	0	0	1	0
50319420	St. Matthew's FCU	1	1	0	0	0	0	1	0
50320060	Cadmus CU, Inc.	1	1	0	0	0	0	1	0
50263500	Toledo Postal Empl CU Inc	1	1	0	0	1	0	0	0
50264130	Members Trust FCU	1	1	0	0	1	0	0	0
50264200	UTU FCU	1	1	0	0	1	0	0	0
70009383	C R C H Empl FCU	1	1	0	0	0	0	1	0
50269920	City Co FCU	1	1	0	1	0	0	0	0
50270190	Ambridge Area FCU	1	1	0	1	0	0	0	0

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50270440	A&S FCU	1	1	0	1	0	0	0	0
50270550	First Area FCU	1	1	0	1	0	0	0	0
50252160	Focus FCU	1	1	0	0	1	0	0	0
50252870	CCC Van Wert CU Inc	1	1	0	0	1	0	0	0
50253090	Christo Rey FCU	1	1	0	0	1	0	0	0
50338900	Centerville Clinics Empl FCU	1	1	0	1	0	0	0	0
30901130	Home Savings Bank, FSB	1	1	0	0	0	0	0	1
30003750	Citizens Federal Savings & Loan Association	1	1	0	0	0	0	0	1
50273330	Erie Police FCU	1	1	0	1	0	0	0	0
50273380	Erie Times FCU	1	1	0	1	0	0	0	0
50274300	Greater Latrobe Schools FCU	1	1	0	1	0	0	0	0
50274890	Holy Rosary Church FCU	1	1	0	1	0	0	0	0
50361870	Wawa Empl CU	1	1	0	1	0	0	0	0
70000530	Citizens Bank of Morgantown, Inc.	1	1	1	0	0	0	0	0
10432900	First City Bank	1	1	0	0	1	0	0	0
96673032	M A B C FCU	1	1	0	1	0	0	0	0
50316830	Charlottesville Postal FCU	1	1	0	0	0	0	1	0
50270890	B I FCU	1	1	0	1	0	0	0	0
50271060	Bradford Area FCU	1	1	0	1	0	0	0	0
50271260	Bucks County Empl CU	1	1	0	1	0	0	0	0
50271430	CACL FCU	1	1	0	1	0	0	0	0
50271440	Cal Ed FCU	1	1	0	1	0	0	0	0
50271550	PAKCO Empl FCU	1	1	0	1	0	0	0	0
50271970	Clairton Works FCU	1	1	0	1	0	0	0	0
50272220	Copper & Glass FCU	1	1	0	1	0	0	0	0
50272260	Corry Jamestown CU	1	1	0	1	0	0	0	0
50272530	Delco Postal CU	1	1	0	1	0	0	0	0
50272580	Dertown School FCU	1	1	0	1	0	0	0	0
30035060	Armstrong County Building & Loan Association	1	1	0	1	0	0	0	0
50260380	President's FCU	1	1	0	0	1	0	0	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
50263150	Tappan Community CU, Inc.	1	1	0	0	1	0	0	0
30063610	Blue Grass Federal Savings & Loan Association	1	1	0	0	0	0	0	1
50251530	Northwestern FCU	1	1	0	0	1	0	0	0
50251590	Community First CU	1	1	0	0	1	0	0	0
50251750	Advantage CU Inc	1	1	0	0	1	0	0	0
50281080	Shenango China Area FCU	1	1	0	1	0	0	0	0
50282600	USNE Penitentiary Empl FCU	1	1	0	1	0	0	0	0
50282690	Valley Wide of PA FCU	1	1	0	1	0	0	0	0
50273210	EQT FCU	1	1	0	1	0	0	0	0
50273260	Erie Firefighters FCU	1	1	0	1	0	0	0	0
50273900	1st Ed CU	1	1	0	1	0	0	0	0
50273930	Franklin Regional Schools FCU	1	1	0	1	0	0	0	0
50274720	Hazleton School Empl CU	1	1	0	1	0	0	0	0
50274870	Holsey Temple FCU	1	1	0	1	0	0	0	0
50275290	Iron Workers FCU	1	1	0	1	0	0	0	0
50275420	J D M H FCU	1	1	0	1	0	0	0	0
50275690	J S T C Empl FCU	1	1	0	1	0	0	0	0
50276110	Montoursville Area FCU	1	1	0	1	0	0	0	0
50139960	Masters, Mates and Pilots FCU	1	1	0	0	0	1	0	0
30044400	The Equitable Savings & Loan Company	1	1	0	0	1	0	0	0
98449374	TriState Capital Bank	1	1	0	1	0	0	0	0
50361838	UALU 354 FCU	1	1	0	1	0	0	0	0
50361896	A V H FCU	1	1	0	1	0	0	0	0
50399924	STP Empl FCU	1	1	0	1	0	0	0	0
50361094	Raleigh County Educators FCU	1	1	1	0	0	0	0	0
50361096	Local Union 392 FCU	1	1	0	0	1	0	0	0
98434078	Hyperion Bank	1	1	0	1	0	0	0	0
50316440	Augusta County FCU	1	1	0	0	0	0	1	0
50317080	Danville City Empl FCU	1	1	0	0	0	0	1	0
50317140	Piedmont CU	1	1	0	0	0	0	1	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
50270770	Berylco Empl CU	1	1	0	1	0	0	0	0
50270800	Bessemer System FCU	1	1	0	1	0	0	0	0
50270910	Crayola LLC Empl FCU	1	1	0	1	0	0	0	0
50272070	Colfax Power Plant Empl FCU	1	1	0	1	0	0	0	0
10445440	The Ottoville Bank Company	1	1	0	0	1	0	0	0
50261370	St. Helen FCU	1	1	0	0	1	0	0	0
50262170	Scott Associates CU Inc	1	1	0	0	1	0	0	0
50262390	KRATON Belpre FCU	1	1	0	0	1	0	0	0
50262700	Springfield Postal Empl FCU	1	1	0	0	1	0	0	0
10503560	The Turbotville National Bank	1	1	0	1	0	0	0	0
50281480	Steamfitters Phila FCU	1	1	0	1	0	0	0	0
50282680	Vasco FCU	1	1	0	1	0	0	0	0
50282890	Washington Area Teachers FCU	1	1	0	1	0	0	0	0
50283060	FirstEnergy Choice FCU	1	1	0	1	0	0	0	0
50324190	Able FCU	1	1	0	0	0	1	0	0
50358310	Spojnia CU	1	1	0	1	0	0	0	0
50190100	Carco FCU	1	1	0	0	0	1	0	0
50190270	HEALTHCARE 1st FCU	1	1	0	0	0	1	0	0
50191360	Post Office CU of Maryland Inc	1	1	0	0	0	1	0	0
50192030	Wor Co FCU	1	1	0	0	0	1	0	0
30904650	Union Building & Loan Savings Bank	1	1	0	1	0	0	0	0
10438140	The Hamler State Bank	1	1	0	0	1	0	0	0
50325070	Kemba Charleston FCU	1	1	1	0	0	0	0	0
50325340	National Empl FCU	1	1	1	0	0	0	0	0
50325740	Strip Steel Community FCU	1	1	1	0	0	0	0	0
50326000	W E E FCU	1	1	1	0	0	0	0	0
50181510	Eastern Kentucky FCU	1	1	0	0	0	0	0	1
50182100	North East KY Cap FCU	1	1	0	0	0	0	0	1
50182410	Security Plus FCU	1	1	0	0	0	0	0	1
50182960	W B H Empl FCU	1	1	0	0	0	0	0	1

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
50258010	NoteWorthy FCU	1	1	0	0	1	0	0	0
50258360	Equitable FCU	1	1	0	0	1	0	0	0
50258880	Atrium CU	1	1	0	0	1	0	0	0
50259670	Nickel Steel FCU	1	1	0	0	1	0	0	0
50318870	Petersburg Federal Reformatory CU Inc	1	1	0	0	0	0	1	0
50318940	Portsmouth Schools FCU	1	1	0	0	0	0	1	0
50277100	McKeesport Bell FCU	1	1	0	1	0	0	0	0
50277460	NE PA Community FCU	1	1	0	1	0	0	0	0
50277570	Mount Pleasant Area School Empl FCU	1	1	0	1	0	0	0	0
50278030	North Penn FCU	1	1	0	1	0	0	0	0
50279210	Pinn Memorial FCU	1	1	0	1	0	0	0	0
50279810	P R R South Fork FCU	1	1	0	1	0	0	0	0
50272250	Corry Area Schools FCU	1	1	0	1	0	0	0	0
50260540	Producers Empl CU, Inc	1	1	0	0	1	0	0	0
50262310	Shaker Heights FCU	1	1	0	0	1	0	0	0
50262500	S & J School Empl FCU	1	1	0	0	1	0	0	0
50251790	The Catholic CU	1	1	0	0	1	0	0	0
50281270	S M M H FCU	1	1	0	1	0	0	0	0
50281760	Teamsters Local 30 FCU	1	1	0	1	0	0	0	0
50282560	URE FCU	1	1	0	1	0	0	0	0
50324400	Cabway Telco FCU	1	1	1	0	0	0	0	0
97705946	SEI Private Trust Company	1	1	0	1	0	0	0	0
50358840	Berkeley County Public Schools FCU	1	1	1	0	0	0	0	0
50191640	Maryland Postal FCU	1	1	0	0	0	1	0	0
50191760	Thiokol Elkton FCU	1	1	0	0	0	1	0	0
50317460	Entrust Financial CU	1	1	0	0	0	0	1	0
50317710	Hampton Roads Educators CU Inc	1	1	0	0	0	0	1	0
50317860	I B E W Local Union 80 FCU	1	1	0	0	0	0	1	0
10446620	The First National Bank of Powhatan Point	1	1	0	0	1	0	0	0
50361500	I B E W Local No 5 FCU	1	1	0	1	0	0	0	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
50254180	Co-op Toledo CU, Inc.	1	1	0	0	1	0	0	0
50254600	Deca CU Inc	1	1	0	0	1	0	0	0
50255600	540 I B E W CU	1	1	0	0	1	0	0	0
96692818	Spring Valley Bank	1	1	0	0	1	0	0	0
50324740	Fayette FCU	1	1	1	0	0	0	0	0
50324970	I B E W 317 FCU	1	1	1	0	0	0	0	0
50325620	Romney FCU	1	1	1	0	0	0	0	0
50326080	Metro Community FCU	1	1	1	0	0	0	0	0
70008538	Wilmac Empl CU	1	1	0	1	0	0	0	0
50181180	Gibbs Aluminum FCU	1	1	0	0	0	0	0	1
50181990	Muhlenberg Community Hospital CU Inc	1	1	0	0	0	0	0	1
30804670	Chelten Hills Savings Bank	1	1	0	1	0	0	0	0
50257650	Latvian Cleveland CU Inc	1	1	0	0	1	0	0	0
50277860	New Kensington Municipal FCU	1	1	0	1	0	0	0	0
50278120	Norwin Teachers FCU	1	1	0	1	0	0	0	0
50279530	Plumbers Local #27 FCU	1	1	0	1	0	0	0	0
50279830	P S T C Empl FCU	1	1	0	1	0	0	0	0
50340110	Lake Community FCU	1	1	0	0	1	0	0	0
50350160	Hancock School Empl FCU	1	1	1	0	0	0	0	0
50350180	Putnam School Empl FCU	1	1	1	0	0	0	0	0
50354330	Coshocton FCU	1	1	0	0	1	0	0	0
97021120	Century Bank of Kentucky, Inc.	1	1	0	0	0	0	0	1
10221020	Peoples Bank	1	1	0	0	0	0	0	1
10221500	Peoples Bank & Trust Co.	1	1	0	0	0	0	0	1
50359650	Marion County School Empl FCU	1	1	1	0	0	0	0	0
50319120	RiverTrace FCU	1	1	0	0	0	0	1	0
50263600	CANDO CU Inc	1	1	0	0	1	0	0	0
50263990	Ashland Community FCU	1	1	0	0	1	0	0	0
50264510	Wes CU Inc	1	1	0	0	1	0	0	0
50264810	W T Community FCU	1	1	0	0	1	0	0	0

INST ID	FI_NAME	NAT_BR ANCH_C OUNT	WEST_V IRGINIA_ REGION_ BRANC HES	WV_BRA NCHES	PA_BRA NCHES	OH_BRA NCHES	MD_BRA NCHES	VA_BRA NCHES	KY_BRA NCHES
98358960	Peoples Bank and Trust Company of Clinton County	1	1	0	0	0	0	0	1
30029690	First Federal Savings & Loan Association of Van Wert	1	1	0	0	1	0	0	0
70008938	Korean Catholic FCU	1	1	0	0	0	1	0	0
70009105	First Baptist Church of Darby FCU	1	1	0	1	0	0	0	0
70009361	Capital Area Taiwanese FCU	1	1	0	0	0	1	0	0
70009374	Logan County School Empl FCU	1	1	1	0	0	0	0	0
70009406	Halifax County Community FCU	1	1	0	0	0	0	1	0
50270080	A.B. FCU	1	1	0	1	0	0	0	0
50270680	Beaver Falls Pennsylvania Teachers FCU	1	1	0	1	0	0	0	0
50252720	Carey Poverello FCU	1	1	0	0	1	0	0	0
50283640	Wyoming Valley West Community FCU	1	1	0	1	0	0	0	0
30021860	Versailles Savings & Loan Company	1	1	0	0	1	0	0	0
35900025	Geauga Savings Bank	1	1	0	0	1	0	0	0
50336360	Champion FCU	1	1	0	0	1	0	0	0
50339440	Minerva Area FCU	1	1	0	0	1	0	0	0
30903850	Woodsfield Savings Bank	1	1	0	0	1	0	0	0

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## Appendix 2: PDF Summary Report

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## Asset Verification Services (AVS) Results Report

Case Name		Applicant Name	
Case Number		Applicant SSN	
Program Type		Spouse Name	
Household Size		Spouse SSN	
Resource Limit		Spouse Applying?	
Current Countable Resources		Address	(Address1)
Excluded Resources			
Amount Countable Resources Over/Under at Decision or Today (if no decision)			(City, State, Zip)
Eligibility Decision	(Eligible, Ineligible, Transfer Penalty, Closed, No Decision)	Application Date	
Eligibility Decision Date		AVS Request Date	
Results After Decision	(Yes, No)	Report Generation Date	
Countable Resources Received After Decision	(\$ value)		

### Liquid Assets Discovered

Financial Institution	Account Number	Account Holder(s)	FI Response Date	Account Close Date	Previous Month's Account Balance	Current Month's Account Balance

### Property Assets Discovered

Address 1	City, State, Zip	Purchase Date	Market Value	Assessed Value	Sale Date	Sale Price

### AVS Results Summary

Over/Under Resources	(Over, Under)	Suspicious Asset Transfer	(Yes, No)
Amount Over/Under	(\$ Value)	Suspicious Month(s)	(Month(s) of Transfer)
Owned Property Value	(\$ Value)	Suspicious Reason(s)	(Property Sale Below Market Value, Significant Individual Account Decrease, Quit Claim Deed Type)



## Liquid Assets - Account Balance Details

Financial Institution Name 1

Look-Back Month	Month	Account Balance	Total Balance of All Accounts
1	July 2017	\$2,984.76	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
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42			
43			
44			
45			
46			



Look-Back Month	Month	Account Balance	Total Balance of All Accounts
47			
48			
49			
50			
51			
52			
53			
54			
55			
56			
57			
58			
59			
60			

Financial Institution Name 2

Look-Back Months	Month	Balance	Over/Under Amount
1	July 2017	\$2,984.76	\$984.76
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
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25			
26			
27			
28			
29			
30			
31			
32			



Look-Back Months	Month	Balance	Over/Under Amount
33			
34			
35			
36			
37			
38			
39			
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41			
42			
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55			
56			
57			
58			
59			
60			

Financial Institution Name 3

Look-Back Months	Month	Balance	Over/Under Amount
1	July 2017	\$2,984.76	\$984.76
2			
3			
4			
5			
6			
7			
8			
9			
10			
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14			
15			
16			
17			
18			

Look-Back Months	Month	Balance	Over/Under Amount
19			
20			
21			
22			
23			
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30			
31			
32			
33			
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## Appendix 3: Terms and Conditions

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## **INSTRUCTIONS TO VENDORS SUBMITTING BIDS**

**1. REVIEW DOCUMENTS THOROUGHLY:** The attached documents contain a solicitation for bids. Please read these instructions and all documents attached in their entirety. These instructions provide critical information about requirements that if overlooked could lead to disqualification of a Vendor's bid. All bids must be submitted in accordance with the provisions contained in these instructions and the Solicitation. Failure to do so may result in disqualification of Vendor's bid.

**2. MANDATORY TERMS:** The Solicitation may contain mandatory provisions identified by the use of the words "must," "will," and "shall." Failure to comply with a mandatory term in the Solicitation will result in bid disqualification.

**3. PREBID MEETING:** The item identified below shall apply to this Solicitation.

A pre-bid meeting will not be held prior to bid opening

A **NON-MANDATORY PRE-BID** meeting will be held at the following place and time:

A **MANDATORY PRE-BID** meeting will be held at the following place and time:

All Vendors submitting a bid must attend the mandatory pre-bid meeting. Failure to attend the mandatory pre-bid meeting shall result in disqualification of the Vendor's bid. No one person attending the pre-bid meeting may represent more than one Vendor.

An attendance sheet provided at the pre-bid meeting shall serve as the official document verifying attendance. The State will not accept any other form of proof or documentation to verify attendance. Any person attending the pre-bid meeting on behalf of a Vendor must list on the attendance sheet his or her name and the name of the Vendor he or she is representing.

Additionally, the person attending the pre-bid meeting should include the Vendor's E-Mail address, phone number, and Fax number on the attendance sheet. It is the Vendor's responsibility to locate the attendance sheet and provide the required information. Failure to complete the attendance sheet as required may result in disqualification of Vendor's bid.

All Vendors should arrive prior to the starting time for the pre-bid. Vendors who arrive after the starting time but prior to the end of the pre-bid will be permitted to sign in, but are charged with knowing all matters discussed at the pre-bid.

Questions submitted at least five business days prior to a scheduled pre-bid will be discussed at the pre-bid meeting if possible. Any discussions or answers to questions at the pre-bid meeting are preliminary in nature and are non-binding. Official and binding answers to questions will be published in a written addendum to the Solicitation prior to bid opening.

**4. VENDOR QUESTION DEADLINE:** Vendors may submit questions relating to this Solicitation to the Purchasing Division. Questions must be submitted in writing. All questions must be submitted on or before the date listed below and to the address listed below in order to be considered. A written response will be published in a Solicitation addendum if a response is possible and appropriate. Non-written discussions, conversations, or questions and answers regarding this Solicitation are preliminary in nature and are nonbinding.

Submitted e-mails should have solicitation number in the subject line.

Question Submission Deadline: **October 18, 2017 by 4:00 PM, EST**

Submit Questions to: **Charles Barnette**

2019 Washington Street, East

Charleston, WV 25305

Fax: (304) 558-4115 (Vendors should not use this fax number for bid submission)

Email: [Charles.D.Barnette@wv.gov](mailto:Charles.D.Barnette@wv.gov)

**5. VERBAL COMMUNICATION:** Any verbal communication between the Vendor and any State personnel is not binding, including verbal communication at the mandatory pre-bid conference. Only information issued in writing and added to the Solicitation by an official written addendum by the Purchasing Division is binding.

**6. BID SUBMISSION:** All bids must be submitted electronically through wvOASIS or signed and delivered by the Vendor to the Purchasing Division at the address listed below on or before the date and time of the bid opening. Any bid received by the Purchasing Division staff is considered to be in the possession of the Purchasing Division and will not be returned for any reason. The Purchasing Division will not accept bids, modification of bids, or addendum acknowledgment forms via e-mail. Acceptable delivery methods include electronic submission via wvOASIS, hand delivery, delivery by courier, or facsimile.



The bid delivery address is:  
Department of Administration, Purchasing Division  
2019 Washington Street East  
Charleston, WV 25305-0130

A bid that is not submitted electronically through wvOASIS should contain the information listed below on the face of the envelope or the bid may be rejected by the Purchasing Division.:

SEALED BID:  
BUYER:  
SOLICITATION NO.:  
BID OPENING DATE:  
BID OPENING TIME:  
FAX NUMBER:

The Purchasing Division may prohibit the submission of bids electronically through wvOASIS at its sole discretion. Such a prohibition will be contained and communicated in the wvOASIS system resulting in the Vendor's inability to submit bids through wvOASIS. Submission of a response to an Expression of Interest or Request for Proposal is not permitted in wvOASIS.

**For Request For Proposal ("RFP") Responses Only:** In the event that Vendor is responding to a request for proposal, the Vendor shall submit one original technical and one original cost proposal plus N/A convenience copies of each to the Purchasing Division at the address shown above. Additionally, the Vendor should identify the bid type as either a technical or cost proposal on the face of each bid envelope submitted in response to a request for proposal as follows:

BID TYPE: (This only applies to CRFP)

- Technical  
 Cost

**7. BID OPENING:** Bids submitted in response to this Solicitation will be opened at the location identified below on the date and time listed below. Delivery of a bid after the bid opening date and time will result in bid disqualification. For purposes of this Solicitation, a bid is considered delivered when confirmation of delivery is provided by wvOASIS (in the case of electronic submission) or when the bid is time stamped by the official Purchasing Division time clock (in the case of hand delivery).

Bid Opening Date and Time: October 26, 2017 at 1:30 PM, EST

Bid Opening Location: Department of Administration, Purchasing Division  
2019 Washington Street East  
Charleston, WV 25305-0130

**8. ADDENDUM ACKNOWLEDGEMENT:** Changes or revisions to this Solicitation will be made by an official written addendum issued by the Purchasing Division. Vendor should acknowledge receipt of all addenda issued with this Solicitation by completing an Addendum Acknowledgment Form, a copy of which is included herewith. Failure to acknowledge addenda may result in bid disqualification. The addendum acknowledgement should be submitted with the bid to expedite document processing.

**9. BID FORMATTING:** Vendor should type or electronically enter the information onto its bid to prevent errors in the evaluation. Failure to type or electronically enter the information may result in bid disqualification.

**10. ALTERNATES:** Any model, brand, or specification listed in this Solicitation establishes the acceptable level of quality only and is not intended to reflect a preference for, or in any way favor, a particular brand or vendor. Vendors may bid alternates to a listed model or brand provided that the alternate is at least equal to the model or brand and complies with the required specifications. The equality of any alternate being bid shall be determined by the State at its sole discretion. Any Vendor bidding an alternate model or brand should clearly identify the alternate items in its bid and should include manufacturer's specifications, industry literature, and/or any other relevant documentation demonstrating the equality of the alternate items. Failure to provide information for alternate items may be grounds for rejection of a Vendor's bid.

**11. EXCEPTIONS AND CLARIFICATIONS:** The Solicitation contains the specifications that shall form the basis of a contractual agreement. Vendor shall clearly mark any exceptions, clarifications, or other proposed modifications in its bid. Exceptions to, clarifications of, or modifications of a requirement or term and condition of the Solicitation may result in bid disqualification.

**12. COMMUNICATION LIMITATIONS:** In accordance with West Virginia Code of State Rules §148-1-6.6, communication with the State of West Virginia or any of its employees regarding this Solicitation during the solicitation, bid, evaluation or award periods, except through the Purchasing Division, is strictly prohibited without prior Purchasing Division approval. Purchasing Division approval for such communication is implied for all agency delegated and exempt purchases.

**13. REGISTRATION:** Prior to Contract award, the apparent successful Vendor must be properly registered with the West Virginia Purchasing Division and must have paid the \$125 fee, if applicable.

**14. UNIT PRICE:** Unit prices shall prevail in cases of a discrepancy in the Vendor's bid.

**15. PREFERENCE:** Vendor Preference may only be granted upon written request and only in accordance with the West Virginia Code § 5A-3-37 and the West Virginia Code of State Rules. A Vendor Preference Certificate form has been attached hereto to allow Vendor to apply for the preference. Vendor's failure to submit the Vendor Preference Certificate form with its bid will result in denial of Vendor Preference. Vendor Preference does not apply to construction projects.

**16. SMALL, WOMEN-OWNED, OR MINORITY-OWNED BUSINESSES:** For any solicitations publicly advertised for bid, in accordance with West Virginia Code §5A-3-37(a)(7) and W. Va. CSR § 148-22-9, any non-resident vendor certified as a small, women-owned, or minority-owned business under W. Va. CSR § 148-22-9 shall be provided the same preference made available to any resident vendor. Any non-resident small, women-owned, or minority-owned business must identify itself as such in writing, must submit that writing to the Purchasing Division with its bid, and must be properly certified under W. Va. CSR § 148-22-9 prior to contract award to receive the preferences made available to resident vendors. Preference for a non-resident small, women-owned, or minority owned business shall be applied in accordance with W. Va. CSR § 148-22-9.

**17. WAIVER OF MINOR IRREGULARITIES:** The Director reserves the right to waive minor irregularities in bids or specifications in accordance with West Virginia Code of State Rules § 148-1-4.6.

**18. ELECTRONIC FILE ACCESS RESTRICTIONS:** Vendor must ensure that its submission in wvOASIS can be accessed and viewed by the Purchasing Division staff immediately upon bid opening. The Purchasing Division will consider any file that cannot be immediately accessed and viewed at the time of the bid opening (such as, encrypted files, password protected files, or incompatible files) to be blank or incomplete as context requires, and are therefore unacceptable. A vendor will not be permitted to unencrypt files, remove password protections, or resubmit documents after bid opening to make a file viewable if those documents are required with the bid. A Vendor may be required to provide document passwords or remove access restrictions to allow the Purchasing Division to print or electronically save documents provided that those documents are viewable by the Purchasing Division prior to obtaining the password or removing the access restriction.

**19. NON-RESPONSIBLE:** The Purchasing Division Director reserves the right to reject the bid of any vendor as Non-Responsible in accordance with W. Va. Code of State Rules § 148-1-5.3, when the Director determines that the vendor submitting the bid does not have the capability to fully perform, or lacks the integrity and reliability to assure good-faith performance.”

**20. ACCEPTANCE/REJECTION:** The State may accept or reject any bid in whole, or in part in accordance with W. Va. Code of State Rules § 148-1-4.5. and § 148-1-6.4.b.”

**21. YOUR SUBMISSION IS A PUBLIC DOCUMENT:** Vendor's entire response to the Solicitation and the resulting Contract are public documents. As public documents, they will be disclosed to the public following the bid/proposal opening or award of the contract, as required by the competitive bidding laws of West Virginia Code §§ 5A-3-1 et seq., 5-22-1 et seq., and 5G-1-1 et seq. and the Freedom of Information Act West Virginia Code §§ 29B-1-1 et seq.

**DO NOT SUBMIT MATERIAL YOU CONSIDER TO BE CONFIDENTIAL, A TRADE SECRET, OR OTHERWISE NOT SUBJECT TO PUBLIC DISCLOSURE.**

Submission of any bid, proposal, or other document to the Purchasing Division constitutes your explicit consent to the subsequent public disclosure of the bid, proposal, or document. The Purchasing Division will disclose any document labeled "confidential," "proprietary," "trade secret," "private," or labeled with any other claim against public disclosure of the documents, to include any "trade secrets" as defined by West Virginia Code § 47-22-1 et seq. All submissions are subject to public disclosure without notice.

**22. INTERESTED PARTY DISCLOSURE:** W. Va. Code § 6D-1-2 requires that for contracts with an actual or estimated value of at least \$100,000, the vendor must submit to the Purchasing Division a disclosure of interested parties to the contract, prior to contract award. That disclosure must occur on the form prescribed and approved by the WV Ethics Commission. A copy of that form is included with this solicitation or can be obtained from the WV Ethics Commission. "Interested parties" means: (1) A business entity performing work or service pursuant to, or in furtherance of, the applicable contract, including specifically sub-contractors; (2) the person(s) who have an ownership interest equal to or greater than 25% in the business entity performing work or service pursuant to, or in furtherance of, the applicable contract; and (3) the person or business entity, if any, that served as a compensated broker or intermediary to actively facilitate the applicable contract or negotiated the terms of the applicable contract with the state agency: Provided, That subdivision (2) shall be inapplicable if a business entity is a publicly traded company: Provided, however, That subdivision (3) shall not include persons or business entities performing legal services related to the negotiation or drafting of the applicable contract.

## GENERAL TERMS AND CONDITIONS:

**1. CONTRACTUAL AGREEMENT:** Issuance of a Award Document signed by the Purchasing Division Director, or his designee, and approved as to form by the Attorney General's office constitutes acceptance of this Contract made by and between the State of West Virginia and the Vendor. Vendor's signature on its bid signifies Vendor's agreement to be bound by and accept the terms and conditions contained in this Contract.

**2. DEFINITIONS:** As used in this Solicitation/Contract, the following terms shall have the meanings attributed to them below. Additional definitions may be found in the specifications included with this Solicitation/Contract.

**2.1. "Agency" or "Agencies"** means the agency, board, commission, or other entity of the State of West Virginia that is identified on the first page of the Solicitation or any other public entity seeking to procure goods or services under this Contract.

**2.2. "Bid" or "Proposal"** means the vendors submitted response to this solicitation.

**2.3. "Contract"** means the binding agreement that is entered into between the State and the Vendor to provide the goods or services requested in the Solicitation.

**2.4. "Director"** means the Director of the West Virginia Department of Administration, Purchasing Division.

**2.5. "Purchasing Division"** means the West Virginia Department of Administration, Purchasing Division.

**2.6. "Award Document"** means the document signed by the Agency and the Purchasing Division, and approved as to form by the Attorney General, that identifies the Vendor as the contract holder.

**2.7. "Solicitation"** means the official notice of an opportunity to supply the State with goods or services that is published by the Purchasing Division.

**2.8. "State"** means the State of West Virginia and/or any of its agencies, commissions, boards, etc. as context requires.

**2.9. "Vendor" or "Vendors"** means any entity submitting a bid in response to the Solicitation, the entity that has been selected as the lowest responsible bidder, or the entity that has been awarded the Contract as context requires.

**3. CONTRACT TERM; RENEWAL; EXTENSION:** The term of this Contract shall be determined in accordance with the category that has been identified as applicable to this Contract below:

**Term Contract**

**Initial Contract Term:** This Contract becomes effective on  
Upon Award \_\_\_\_\_ and extends for a period of One (1) year(s).

**Renewal Term:** This Contract may be renewed upon the mutual written consent of the Agency, and the Vendor, with approval of the Purchasing Division and the Attorney General's office (Attorney General approval is as to form only). Any request for renewal should be submitted to the Purchasing Division thirty (30) days prior to the expiration date of the initial contract term or appropriate renewal term. A Contract renewal shall be in accordance with the terms and conditions of the original contract. Renewal of this Contract is limited to Five (5) successive one (1) year periods or multiple renewal periods of less than one year, provided that the multiple renewal periods do not exceed Sixty (60) months in total. Automatic renewal of this Contract is prohibited. Notwithstanding the foregoing, Purchasing Division approval is not required on agency delegated or exempt purchases. Attorney General approval may be required for vendor terms and conditions.

**Delivery Order Limitations:** In the event that this contract permits delivery orders, a delivery order may only be issued during the time this Contract is in effect. Any delivery order issued within one year of the expiration of this Contract shall be effective for one year from the date the delivery order is issued. No delivery order may be extended beyond one year after this Contract has expired.

**Fixed Period Contract:** This Contract becomes effective upon Vendor's receipt of the notice to proceed and must be completed within \_\_\_\_\_ days.

**Fixed Period Contract with Renewals:** This Contract becomes effective upon Vendor's receipt of the notice to proceed and part of the Contract more fully described in the attached specifications must be completed within \_\_\_\_\_ days.

Upon completion, the vendor agrees that maintenance, monitoring, or warranty services will be provided for one year thereafter with an additional \_\_\_\_\_ successive one year renewal periods or multiple renewal periods of less than one year provided that the multiple renewal periods do not exceed \_\_\_\_\_ months in total. Automatic renewal of this Contract is prohibited.

**One Time Purchase:** The term of this Contract shall run from the issuance of the Award Document until all of the goods contracted for have been delivered, but in no event will this Contract extend for more than one fiscal year.

**Other:** See attached.

**4. NOTICE TO PROCEED:** Vendor shall begin performance of this Contract immediately upon receiving notice to proceed unless otherwise instructed by the Agency. Unless otherwise specified, the fully executed Award Document will be considered notice to proceed.

**5. QUANTITIES:** The quantities required under this Contract shall be determined in accordance with the category that has been identified as applicable to this Contract below.

**Open End Contract:** Quantities listed in this Solicitation are approximations only, based on estimates supplied by the Agency. It is understood and agreed that the Contract shall cover the quantities actually ordered for delivery during the term of the Contract, whether more or less than the quantities shown.

**Service:** The scope of the service to be provided will be more clearly defined in the specifications included herewith.

**Combined Service and Goods:** The scope of the service and deliverable goods to be provided will be more clearly defined in the specifications included herewith.

**One Time Purchase:** This Contract is for the purchase of a set quantity of goods that are identified in the specifications included herewith. Once those items have been delivered, no additional goods may be procured under this Contract without an appropriate change order approved by the Vendor, Agency, Purchasing Division, and Attorney General's office.

**6. EMERGENCY PURCHASES:** The Purchasing Division Director may authorize the Agency to purchase goods or services in the open market that Vendor would otherwise provide under this Contract if those goods or services are for immediate or expedited delivery in an emergency. Emergencies shall include, but are not limited to, delays in transportation or an unanticipated increase in the volume of work. An emergency purchase in the open market, approved by the Purchasing Division Director, shall not constitute a breach of this Contract and shall not entitle the Vendor to any form of compensation or damages. This provision does not excuse the State from fulfilling its obligations under a One Time Purchase contract.

**7. REQUIRED DOCUMENTS:** All of the items checked below must be provided to the Purchasing Division by the Vendor as specified below.

**BID BOND (Construction Only):** Pursuant to the requirements contained in W. Va. Code § 5-22-1(c), All Vendors submitting a bid on a construction project shall furnish a valid bid bond in the amount of five percent (5%) of the total amount of the bid protecting the State of West Virginia. The bid bond must be submitted with the bid.

**PERFORMANCE BOND:** The apparent successful Vendor shall provide a performance bond in the amount of \_\_\_\_\_. The performance bond must be received by the Purchasing Division prior to Contract award. On construction contracts, the performance bond must be 100% of the Contract value.

**LABOR/MATERIAL PAYMENT BOND:** The apparent successful Vendor shall provide a labor/material payment bond in the amount of 100% of the Contract value. The labor/material payment bond must be delivered to the Purchasing Division prior to Contract award.

In lieu of the Bid Bond, Performance Bond, and Labor/Material Payment Bond, the Vendor may provide certified checks, cashier's checks, or irrevocable letters of credit. Any certified check, cashier's check, or irrevocable letter of credit provided in lieu of a bond must be of the same amount and delivered on the same schedule as the bond it replaces. A letter of credit submitted in lieu of a performance and labor/material payment bond will only be allowed for projects under \$100,000. Personal or business checks are not acceptable. Notwithstanding the foregoing, West Virginia Code § 5-22-1 (d) mandates that a vendor provide a performance and labor/material payment bond for construction projects. Accordingly, substitutions for the performance and labor/material payment bonds for construction projects is not permitted.

**MAINTENANCE BOND:** The apparent successful Vendor shall provide a two (2) year maintenance bond covering the roofing system. The maintenance bond must be issued and delivered to the Purchasing Division prior to Contract award.

**LICENSE(S) / CERTIFICATIONS / PERMITS:** In addition to anything required under the Section entitled Licensing, of the General Terms and Conditions, the apparent successful Vendor shall furnish proof of the following licenses, certifications, and/or permits prior to Contract award, in a form acceptable to the Purchasing Division.

The apparent successful Vendor shall also furnish proof of any additional licenses or certifications contained in the specifications prior to Contract award regardless of whether or not that requirement is listed above.



**8. INSURANCE:** The apparent successful Vendor shall furnish proof of the insurance identified by a checkmark below prior to Contract award. Subsequent to contract award, and prior to the insurance expiration date, Vendor shall provide the Agency with proof that the insurance mandated herein has been continued. Vendor must also provide Agency with immediate notice of any changes in its insurance policies mandated herein, including but not limited to, policy cancelation, policy reduction, or change in insurers. The insurance coverages identified below must be maintained throughout the life of this contract. The apparent successful Vendor shall also furnish proof of any additional insurance requirements contained in the specifications prior to Contract award regardless of whether or not that insurance requirement is listed in this section.

Vendor must maintain:

**Commercial General Liability Insurance** in at least an amount of:

\$1,000,000 per occurrence

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**Automobile Liability Insurance** in at least an amount of: \_\_\_\_\_

**Professional/Malpractice/Errors and Omission Insurance** in at least an amount of:

\$3,000,000 aggregate for professional liability, negligence, errors, omissions and public liability

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**Commercial Crime and Third Party Fidelity Insurance** in an amount of:

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**Cyber Liability Insurance** in an amount of: \_\_\_\_\_

**Builders Risk Insurance** in an amount equal to 100% of the amount of the Contract.

**9. WORKERS' COMPENSATION INSURANCE:** The apparent successful Vendor shall comply with laws relating to workers compensation, shall maintain workers' compensation insurance when required, and shall furnish proof of workers' compensation insurance upon request.

**10. LITIGATION BOND:** The Director reserves the right to require any Vendor that files a protest of an award to submit a litigation bond in the amount equal to one percent of the lowest bid submitted or \$5,000, whichever is greater. The entire amount of the bond shall be forfeited if the hearing officer determines that the protest was filed for frivolous or improper purpose, including but not limited to, the purpose of harassing, causing unnecessary delay, or needless expense for the Agency. All litigation bonds shall be made payable to the Purchasing Division. In lieu of a bond, the protester may submit a cashier's check or certified check payable to the Purchasing Division. Cashier's or certified checks will be deposited with and held by the State Treasurer's office. If it is determined that the protest has not been filed for frivolous or improper purpose, the bond or deposit shall be returned in its entirety.

**11. LIQUIDATED DAMAGES:** Vendor shall pay liquidated damages in the amount of

for \_\_\_\_\_.

This clause shall in no way be considered exclusive and shall not limit the State or Agency's right to pursue any other available remedy.

**12. ACCEPTANCE:** Vendor's signature on its bid, or on the certification and signature page, constitutes an offer to the State that cannot be unilaterally withdrawn, signifies that the product or service proposed by vendor meets the mandatory requirements contained in the Solicitation for that product or service, unless otherwise indicated, and signifies acceptance of the terms and conditions contained in the Solicitation unless otherwise indicated.

**13. PRICING:** The pricing set forth herein is firm for the life of the Contract, unless specified elsewhere within this Solicitation/Contract by the State. A Vendor's inclusion of price adjustment provisions in its bid, without an express authorization from the State in the Solicitation to do so, may result in bid disqualification.

**14. PAYMENT:** Payment in advance is prohibited under this Contract. Payment may only be made after the delivery and acceptance of goods or services. The Vendor shall submit invoices, in arrears.

**15. PURCHASING CARD ACCEPTANCE:** The State of West Virginia currently utilizes a Purchasing Card program, administered under contract by a banking institution, to process payment for goods and services. The Vendor must accept the State of West Virginia's Purchasing Card for payment of all orders under this Contract unless the box below is checked.

Vendor is not required to accept the State of West Virginia's Purchasing Card as payment for all goods and services.

**16. TAXES:** The Vendor shall pay any applicable sales, use, personal property or any other taxes arising out of this Contract and the transactions contemplated thereby. The State of West Virginia is exempt from federal and state taxes and will not pay or reimburse such taxes.

**17. ADDITIONAL FEES:** Vendor is not permitted to charge additional fees or assess additional charges that were not either expressly provided for in the solicitation published by the State of West Virginia or included in the unit price or lump sum bid amount that Vendor is required by the solicitation to provide. Including such fees or charges as notes to the solicitation may result in rejection of vendor's bid. Requesting such fees or charges be paid after the contract has been awarded may result in cancellation of the contract.

**18. FUNDING:** This Contract shall continue for the term stated herein, contingent upon funds being appropriated by the Legislature or otherwise being made available. In the event funds are not appropriated or otherwise made available, this Contract becomes void and of no effect beginning on July 1 of the fiscal year for which funding has not been appropriated or otherwise made available.

**19. CANCELLATION:** The Purchasing Division Director reserves the right to cancel this Contract immediately upon written notice to the vendor if the materials or workmanship supplied do not conform to the specifications contained in the Contract. The Purchasing Division Director may also cancel any purchase or Contract upon 30 days written notice to the Vendor in accordance with West Virginia Code of State Rules § 148-1-6.1.e.

**20. TIME:** Time is of the essence with regard to all matters of time and performance in this Contract.

**21. APPLICABLE LAW:** This Contract is governed by and interpreted under West Virginia law without giving effect to its choice of law principles. Any information provided in specification manuals, or any other source, verbal or written, which contradicts or violates the West Virginia Constitution, West Virginia Code or West Virginia Code of State Rules is void and of no effect.

**22. COMPLIANCE WITH LAWS:** Vendor shall comply with all applicable federal, state, and local laws, regulations and ordinances. By submitting a bid, Vendor acknowledges that it has reviewed, understands, and will comply with all applicable laws, regulations, and ordinances.

**23. ARBITRATION:** Any references made to arbitration contained in this Contract, Vendor's bid, or in any American Institute of Architects documents pertaining to this Contract are hereby deleted, void, and of no effect.

**24. MODIFICATIONS:** This writing is the parties' final expression of intent. Notwithstanding anything contained in this Contract to the contrary no modification of this Contract shall be binding without mutual written consent of the Agency, and the Vendor, with approval of the Purchasing Division and the Attorney General's office (Attorney General approval is as to form only). Any change to existing contracts that adds work or changes contract cost, and were not included in the original contract, must be approved by the Purchasing Division and the Attorney General's Office (as to form) prior to the implementation of the change or commencement of work affected by the change.

**25. WAIVER:** The failure of either party to insist upon a strict performance of any of the terms or provision of this Contract, or to exercise any option, right, or remedy herein contained, shall not be construed as a waiver or a relinquishment for the future of such term, provision, option, right, or remedy, but the same shall continue in full force and effect. Any waiver must be expressly stated in writing and signed by the waiving party.

**26. SUBSEQUENT FORMS:** The terms and conditions contained in this Contract shall supersede any and all subsequent terms and conditions which may appear on any form documents submitted by Vendor to the Agency or Purchasing Division such as price lists, order forms, invoices, sales agreements, or maintenance agreements, and includes internet websites or other electronic documents. Acceptance or use of Vendor's forms does not constitute acceptance of the terms and conditions contained thereon.

**27. ASSIGNMENT:** Neither this Contract nor any monies due, or to become due hereunder, may be assigned by the Vendor without the express written consent of the Agency, the Purchasing Division, the Attorney General's office (as to form only), and any other government agency or office that may be required to approve such assignments. Notwithstanding the foregoing, Purchasing Division approval may or may not be required on certain agency delegated or exempt purchases.

**28. WARRANTY:** The Vendor expressly warrants that the goods and/or services covered by this Contract will: (a) conform to the specifications, drawings, samples, or other description furnished or specified by the Agency; (b) be merchantable and fit for the purpose intended; and (c) be free from defect in material and workmanship.

**29. STATE EMPLOYEES:** State employees are not permitted to utilize this Contract for personal use and the Vendor is prohibited from permitting or facilitating the same.

**30. BANKRUPTCY:** In the event the Vendor files for bankruptcy protection, the State of West Virginia may deem this Contract null and void, and terminate this Contract without notice.

**31. PRIVACY, SECURITY, AND CONFIDENTIALITY:** The Vendor agrees that it will not disclose to anyone, directly or indirectly, any such personally identifiable information or other confidential information gained from the Agency, unless the individual who is the subject of the information consents to the disclosure in writing or the disclosure is made pursuant to the Agency's policies, procedures, and rules. Vendor further agrees to comply with the Confidentiality Policies and Information Security Accountability Requirements, set forth in <http://www.state.wv.us/admin/purchase/privacy/default.html>.

**32. YOUR SUBMISSION IS A PUBLIC DOCUMENT:** Vendor's entire response to the Solicitation and the resulting Contract are public documents. As public documents, they will be disclosed to the public following the bid/proposal opening or award of the contract, as required by the competitive bidding laws of West Virginia Code §§ 5A-3-1 et seq., 5-22-1 et seq., and 5G-1-1 et seq. and the Freedom of Information Act West Virginia Code §§ 29B-1-1 et seq.

**DO NOT SUBMIT MATERIAL YOU CONSIDER TO BE CONFIDENTIAL, A TRADE SECRET, OR OTHERWISE NOT SUBJECT TO PUBLIC DISCLOSURE.**

Submission of any bid, proposal, or other document to the Purchasing Division constitutes your explicit consent to the subsequent public disclosure of the bid, proposal, or document. The Purchasing Division will disclose any document labeled "confidential," "proprietary," "trade secret," "private," or labeled with any other claim against public disclosure of the documents, to include any "trade secrets" as defined by West Virginia Code § 47-22-1 et seq. All submissions are subject to public disclosure without notice.

**33. LICENSING:** In accordance with West Virginia Code of State Rules § 148-1-6.1.e, Vendor must be licensed and in good standing in accordance with any and all state and local laws and requirements by any state or local agency of West Virginia, including, but not limited to, the West Virginia Secretary of State's Office, the West Virginia Tax Department, West Virginia Insurance Commission, or any other state agency or political subdivision. Upon request, the Vendor must provide all necessary releases to obtain information to enable the Purchasing Division Director or the Agency to verify that the Vendor is licensed and in good standing with the above entities.

**34. ANTITRUST:** In submitting a bid to, signing a contract with, or accepting a Award Document from any agency of the State of West Virginia, the Vendor agrees to convey, sell, assign, or transfer to the State of West Virginia all rights, title, and interest in and to all causes of action it may now or hereafter acquire under the antitrust laws of the United States and the State of West Virginia for price fixing and/or unreasonable restraints of trade relating to the particular commodities or services purchased or acquired by the State of West Virginia. Such assignment shall be made and become effective at the time the purchasing agency tenders the initial payment to Vendor.

**35. VENDOR CERTIFICATIONS:** By signing its bid or entering into this Contract, Vendor certifies (1) that its bid or offer was made without prior understanding, agreement, or connection with any corporation, firm, limited liability company, partnership, person or entity submitting a bid or offer for the same material, supplies, equipment or services; (2) that its bid or offer is in all respects fair and without collusion or fraud; (3) that this Contract is accepted or entered into without any prior understanding, agreement, or connection to any other entity that could be considered a violation of law; and (4) that it has reviewed this Solicitation in its entirety; understands the requirements, terms and conditions, and other information contained herein.

Vendor's signature on its bid or offer also affirms that neither it nor its representatives have any interest, nor shall acquire any interest, direct or indirect, which would compromise the performance of its services hereunder. Any such interests shall be promptly presented in detail to the Agency. The individual signing this bid or offer on behalf of Vendor certifies that he or she is authorized by the Vendor to execute this bid or offer or any documents related thereto on Vendor's behalf; that he or she is authorized to bind the Vendor in a contractual relationship; and that, to the best of his or her knowledge, the Vendor has properly registered with any State agency that may require registration.

**36. VENDOR RELATIONSHIP:** The relationship of the Vendor to the State shall be that of an independent contractor and no principal-agent relationship or employer-employee relationship is contemplated or created by this Contract. The Vendor as an independent contractor is solely liable for the acts and omissions of its employees and agents. Vendor shall be responsible for selecting, supervising, and compensating any and all individuals employed pursuant to the terms of this Solicitation and resulting contract. Neither the Vendor, nor any employees or subcontractors of the Vendor, shall be deemed to be employees of the State for any purpose whatsoever. Vendor shall be exclusively responsible for payment of employees and contractors for all wages and salaries, taxes, withholding payments, penalties, fees, fringe benefits, professional liability insurance premiums, contributions to insurance and pension, or other deferred compensation plans, including but not limited to, Workers' Compensation and Social Security obligations, licensing fees, etc. and the filing of all necessary documents, forms, and returns pertinent to all of the foregoing.

Vendor shall hold harmless the State, and shall provide the State and Agency with a defense against any and all claims including, but not limited to, the foregoing payments, withholdings, contributions, taxes, Social Security taxes, and employer income tax returns.

**37. INDEMNIFICATION:** The Vendor agrees to indemnify, defend, and hold harmless the State and the Agency, their officers, and employees from and against: (1) Any claims or losses for services rendered by any subcontractor, person, or firm performing or supplying services, materials, or supplies in connection with the performance of the Contract; (2) Any claims or losses resulting to any person or entity injured or damaged by the Vendor, its officers, employees, or subcontractors by the publication, translation, reproduction, delivery, performance, use, or disposition of any data used under the Contract in a manner not authorized by the Contract, or by Federal or State statutes or regulations; and (3) Any failure of the Vendor, its officers, employees, or subcontractors to observe State and Federal laws including, but not limited to, labor and wage and hour laws.

**38. PURCHASING AFFIDAVIT:** In accordance with West Virginia Code § 5-22-1(i), the contracting public entity shall not award a contract for a construction project to any bidder that is known to be in default on any monetary obligation owed to the state or a political subdivision of the state, including, but not limited to, obligations related to payroll taxes, property taxes, sales and use taxes, fire service fees, or other fines or fees. Accordingly, prior to contract award, Vendors are required to sign, notarize, and submit the Purchasing Affidavit to the Purchasing Division affirming under oath that it is not in default on any monetary obligation owed to the state or a political subdivision of the state.

**39. ADDITIONAL AGENCY AND LOCAL GOVERNMENT USE:** This Contract may be utilized by other agencies, spending units, and political subdivisions of the State of West Virginia; county, municipal, and other local government bodies; and school districts (“Other Government Entities”). Any extension of this Contract to the aforementioned Other Government Entities must be on the same prices, terms, and conditions as those offered and agreed to in this Contract, provided that such extension is in compliance with the applicable laws, rules, and ordinances of the Other Government Entity. If the Vendor does not wish to extend the prices, terms, and conditions of its bid and subsequent contract to the Other Government Entities, the Vendor must clearly indicate such refusal in its bid. A refusal to extend this Contract to the Other Government Entities shall not impact or influence the award of this Contract in any manner.

**40. CONFLICT OF INTEREST:** Vendor, its officers or members or employees, shall not presently have or acquire an interest, direct or indirect, which would conflict with or compromise the performance of its obligations hereunder. Vendor shall periodically inquire of its officers, members and employees to ensure that a conflict of interest does not arise. Any conflict of interest discovered shall be promptly presented in detail to the Agency.

**41. REPORTS:** Vendor shall provide the Agency and/or the Purchasing Division with the following reports identified by a checked box below:

Such reports as the Agency and/or the Purchasing Division may request. Requested reports may include, but are not limited to, quantities purchased, agencies utilizing the contract, total contract expenditures by agency, etc.

Quarterly reports detailing the total quantity of purchases in units and dollars, along with a listing of purchases by agency. Quarterly reports should be delivered to the Purchasing Division via email at [purchasing.requisitions@wv.gov](mailto:purchasing.requisitions@wv.gov).

**42. BACKGROUND CHECK:** In accordance with W. Va. Code § 15-2D-3, the Director of the Division of Protective Services shall require any service provider whose employees are regularly employed on the grounds or in the buildings of the Capitol complex or who have access to sensitive or critical information to submit to a fingerprint-based state and federal background inquiry through the state repository. The service provider is responsible for any costs associated with the fingerprint-based state and federal background inquiry.

After the contract for such services has been approved, but before any such employees are permitted to be on the grounds or in the buildings of the Capitol complex or have access to sensitive or critical information, the service provider shall submit a list of all persons who will be physically present and working at the Capitol complex to the Director of the Division of Protective Services for purposes of verifying compliance with this provision. The State reserves the right to prohibit a service provider’s employees from accessing sensitive or critical information or to be present at the Capitol complex based upon results addressed from a criminal background check.

Service providers should contact the West Virginia Division of Protective Services by phone at (304) 558-9911 for more information.

**43. PREFERENCE FOR USE OF DOMESTIC STEEL PRODUCTS:** Except when authorized by the Director of the Purchasing Division pursuant to W. Va. Code § 5A-3-56, no contractor may use or supply steel products for a State Contract Project other than those steel products made in the United States. A contractor who uses steel products in violation of this section may be subject to civil penalties pursuant to W. Va. Code § 5A-3-56. As used in this section:

- a. "State Contract Project" means any erection or construction of, or any addition to, alteration of or other improvement to any building or structure, including, but not limited to, roads or highways, or the installation of any heating or cooling or ventilating plants or other equipment, or the supply of and materials for such projects, pursuant to a contract with the State of West Virginia for which bids were solicited on or after June 6, 2001.
- b. "Steel Products" means products rolled, formed, shaped, drawn, extruded, forged, cast, fabricated or otherwise similarly processed, or processed by a combination of two or more or such operations, from steel made by the open heath, basic oxygen, electric furnace, Bessemer or other steel making process. The Purchasing Division Director may, in writing, authorize the use of foreign steel products if:
- c. The cost for each contract item used does not exceed one tenth of one percent (.1%) of the total contract cost or two thousand five hundred dollars (\$2,500.00), whichever is greater. For the purposes of this section, the cost is the value of the steel product as delivered to the project; or
- d. The Director of the Purchasing Division determines that specified steel materials are not produced in the United States in sufficient quantity or otherwise are not reasonably available to meet contract requirements.



**44. PREFERENCE FOR USE OF DOMESTIC ALUMINUM, GLASS, AND STEEL:** In Accordance with W. Va. Code § 5-19-1 et seq., and W. Va. CSR § 148-10-1 et seq., for every contract or subcontract, subject to the limitations contained herein, for the construction, reconstruction, alteration, repair, improvement or maintenance of public works or for the purchase of any item of machinery or equipment to be used at sites of public works, only domestic aluminum, glass or steel products shall be supplied unless the spending officer determines, in writing, after the receipt of offers or bids, (1) that the cost of domestic aluminum, glass or steel products is unreasonable or inconsistent with the public interest of the State of West Virginia, (2) that domestic aluminum, glass or steel products are not produced in sufficient quantities to meet the contract requirements, or (3) the available domestic aluminum, glass, or steel do not meet the contract specifications. This provision only applies to public works contracts awarded in an amount more than fifty thousand dollars (\$50,000) or public works contracts that require more than ten thousand pounds of steel products.

The cost of domestic aluminum, glass, or steel products may be unreasonable if the cost is more than twenty percent (20%) of the bid or offered price for foreign made aluminum, glass, or steel products. If the domestic aluminum, glass or steel products to be supplied or produced in a "substantial labor surplus area", as defined by the United States Department of Labor, the cost of domestic aluminum, glass, or steel products may be unreasonable if the cost is more than thirty percent (30%) of the bid or offered price for foreign made aluminum, glass, or steel products. This preference shall be applied to an item of machinery or equipment, as indicated above, when the item is a single unit of equipment or machinery manufactured primarily of aluminum, glass or steel, is part of a public works contract and has the sole purpose or of being a permanent part of a single public works project. This provision does not apply to equipment or machinery purchased by a spending unit for use by that spending unit and not as part of a single public works project.

All bids and offers including domestic aluminum, glass or steel products that exceed bid or offer prices including foreign aluminum, glass or steel products after application of the preferences provided in this provision may be reduced to a price equal to or lower than the lowest bid or offer price for foreign aluminum, glass or steel products plus the applicable preference. If the reduced bid or offer prices are made in writing and supersede the prior bid or offer prices, all bids or offers, including the reduced bid or offer prices, will be reevaluated in accordance with this rule.

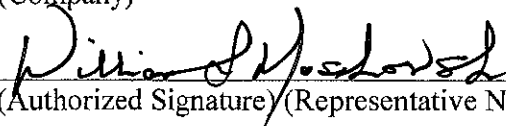
**45. INTERESTED PARTY SUPPLEMENTAL DISCLOSURE:** W. Va. Code § 6D-1-2 requires that for contracts with an actual or estimated value of at least \$100,000, the vendor must submit to the Agency a supplemental disclosure of interested parties reflecting any new or differing interested parties to the contract, which were not included in the original pre-award interested party disclosure, within 30 days following the completion or termination of the contract. A copy of that form is included with this solicitation or can be obtained from the WV Ethics Commission. "Interested parties" means: (1) A business entity performing work or service pursuant to, or in furtherance of, the applicable contract, including specifically sub-contractors; (2) the person(s) who have an ownership interest equal to or greater than 25% in the business entity performing work or service pursuant to, or in furtherance of, the applicable contract; and (3) the person or business entity, if any, that served as a compensated broker or intermediary to actively facilitate the applicable contract or negotiated the terms of the applicable contract with the state agency: Provided, That subdivision (2) shall be inapplicable if a business entity is a publicly traded company: Provided, however, That subdivision (3) shall not include persons or business entities performing legal services related to the negotiation or drafting of the applicable contract. The Agency shall submit a copy of the disclosure to the Ethics Commission within 15 days after receiving the supplemental disclosure of interested parties.

**DESIGNATED CONTACT:** Vendor appoints the individual identified in this Section as the Contract Administrator and the initial point of contact for matters relating to this Contract.

\_\_\_\_\_  
(Name, Title)  
Peter Cheesman, Associate Manager  
\_\_\_\_\_  
(Printed Name and Title)  
Public Consulting Group, Inc., 148 State St., 10th Floor, Boston, MA 02109  
\_\_\_\_\_  
(Address)  
207-861-1950  
\_\_\_\_\_  
(Phone Number) / (Fax Number)  
pcheesman@pcgus.com  
\_\_\_\_\_  
(email address)

**CERTIFICATION AND SIGNATURE:** By signing below, or submitting documentation through wvOASIS, I certify that I have reviewed this Solicitation in its entirety; that I understand the requirements, terms and conditions, and other information contained herein; that this bid, offer or proposal constitutes an offer to the State that cannot be unilaterally withdrawn; that the product or service proposed meets the mandatory requirements contained in the Solicitation for that product or service, unless otherwise stated herein; that the Vendor accepts the terms and conditions contained in the Solicitation, unless otherwise stated herein; that I am submitting this bid, offer or proposal for review and consideration; that I am authorized by the vendor to execute and submit this bid, offer, or proposal, or any documents related thereto on vendor's behalf; that I am authorized to bind the vendor in a contractual relationship; and that to the best of my knowledge, the vendor has properly registered with any State agency that may require registration.

Public Consulting Group, Inc. Public Consulting Group, Inc.  
\_\_\_\_\_  
(Company)

  
\_\_\_\_\_  
(Authorized Signature) (Representative Name, Title)

William S. Mosakowski President & CEO  
\_\_\_\_\_  
(Printed Name and Title of Authorized Representative)

10/23/17  
\_\_\_\_\_  
(Date)

617-426-2026, 617-426-4632  
\_\_\_\_\_  
(Phone Number) (Fax Number)

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## Appendix 4: Purchasing Affidavit

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STATE OF WEST VIRGINIA  
Purchasing Division

**PURCHASING AFFIDAVIT**

**CONSTRUCTION CONTRACTS:** Under W. Va. Code § 5-22-1(i), the contracting public entity shall not award a construction contract to any bidder that is known to be in default on any monetary obligation owed to the state or a political subdivision of the state, including, but not limited to, obligations related to payroll taxes, property taxes, sales and use taxes, fire service fees, or other fines or fees.

**ALL OTHER CONTRACTS:** Under W. Va. Code §5A-3-10a, no contract or renewal of any contract may be awarded by the state or any of its political subdivisions to any vendor or prospective vendor when the vendor or prospective vendor or a related party to the vendor or prospective vendor is a debtor and: (1) the debt owed is an amount greater than one thousand dollars in the aggregate; or (2) the debtor is in employer default.

**EXCEPTION:** The prohibition listed above does not apply where a vendor has contested any tax administered pursuant to chapter eleven of the W. Va. Code, workers' compensation premium, permit fee or environmental fee or assessment and the matter has not become final or where the vendor has entered into a payment plan or agreement and the vendor is not in default of any of the provisions of such plan or agreement.

**DEFINITIONS:**

**"Debt"** means any assessment, premium, penalty, fine, tax or other amount of money owed to the state or any of its political subdivisions because of a judgment, fine, permit violation, license assessment, defaulted workers' compensation premium, penalty or other assessment presently delinquent or due and required to be paid to the state or any of its political subdivisions, including any interest or additional penalties accrued thereon.

**"Employer default"** means having an outstanding balance or liability to the old fund or to the uninsured employers' fund or being in policy default, as defined in W. Va. Code § 23-2c-2, failure to maintain mandatory workers' compensation coverage, or failure to fully meet its obligations as a workers' compensation self-insured employer. An employer is not in employer default if it has entered into a repayment agreement with the Insurance Commissioner and remains in compliance with the obligations under the repayment agreement.

**"Related party"** means a party, whether an individual, corporation, partnership, association, limited liability company or any other form or business association or other entity whatsoever, related to any vendor by blood, marriage, ownership or contract through which the party has a relationship of ownership or other interest with the vendor so that the party will actually or by effect receive or control a portion of the benefit, profit or other consideration from performance of a vendor contract with the party receiving an amount that meets or exceeds five percent of the total contract amount.

**AFFIRMATION:** By signing this form, the vendor's authorized signer affirms and acknowledges under penalty of law for false swearing (W. Va. Code §61-5-3) that: (1) for construction contracts, the vendor is not in default on any monetary obligation owed to the state or a political subdivision of the state, and (2) for all other contracts, that neither vendor nor any related party owe a debt as defined above and that neither vendor nor any related party are in employer default as defined above, unless the debt or employer default is permitted under the exception above.

**WITNESS THE FOLLOWING SIGNATURE:**

Vendor's Name: Public Consulting Group, Inc.

Authorized Signature: *William J. [Signature]* Date: 10/23/17

State of Massachusetts

County of Suffolk, to-wit:

Taken, subscribed, and sworn to before me this 23 day of October, 2017.

My Commission expires January 22, 2021.



NOTARY PUBLIC *Diane E. Casey*  
*Purchasing Affidavit (Revised 07/07/2017)*