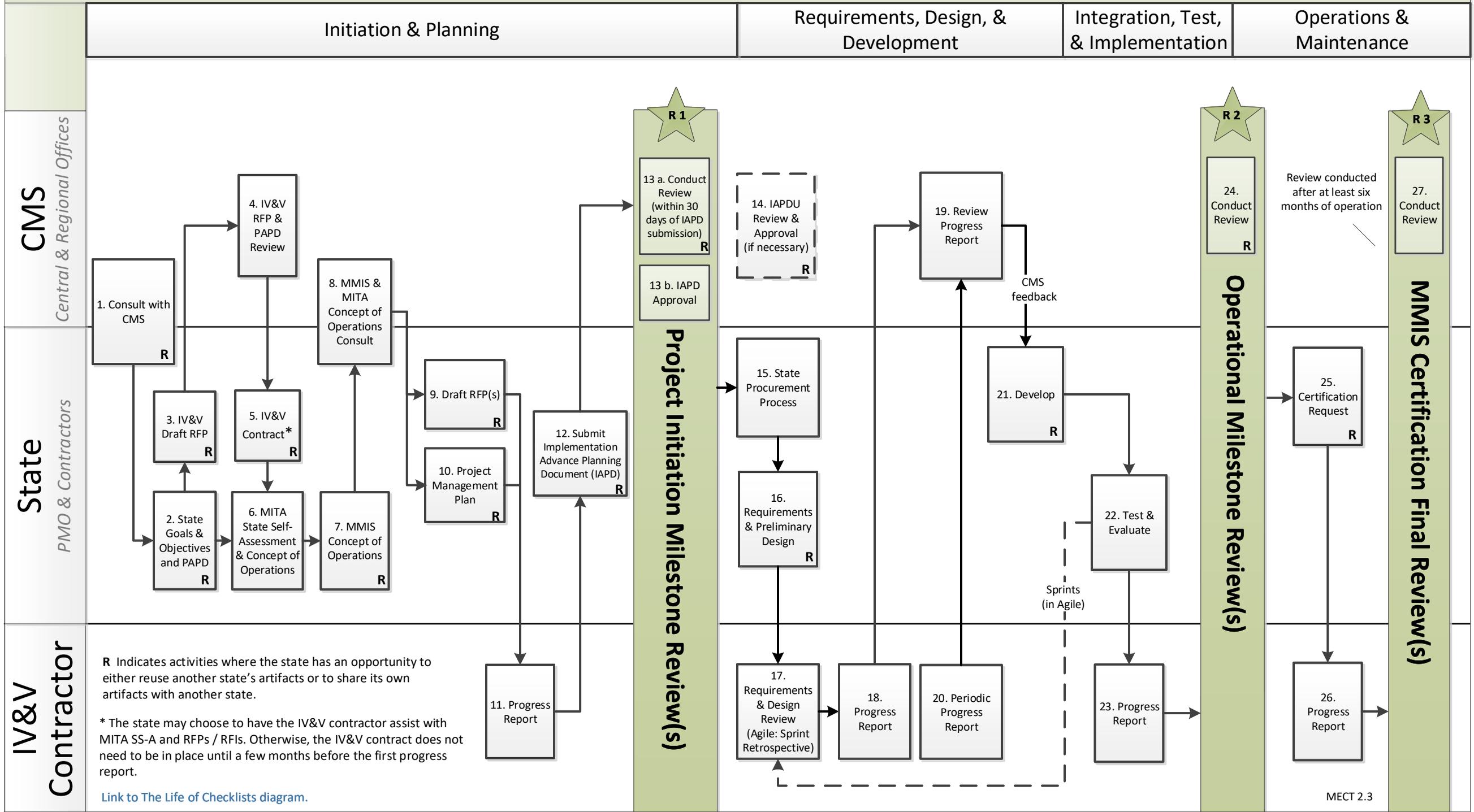


Medicaid Enterprise Certification Life Cycle





1. Consult with CMS

Description

- The initial consult between the state and CMS includes
- Opportunity for CMS Regional Office (RO) to understand the state’s approach
 - Opportunities for state to ask questions about the certification life cycle
 - Opportunity for CMS to advise the state about which checklist set best aligns with the state’s approach
 - In most cases, states will use the MMIS Module Checklist Set. The custom option must be approved by CMS and is only for exceptional cases where non-traditional solutions cannot be covered under the MMIS Module Checklist Set. The customized approach requires approval from CMS.
 - Opportunity for state and CMS to decide on high-level roadmap for certification, including frequency of MMIS IV&V Progress Report
 - Documenting decisions in a Project Partnership Understanding (PPU) document

Activities State Is Expected to Perform

- Notify CMS of intent to update MMIS / module(s)
- Schedule a consult with CMS Regional Office
- Meet with CMS to discuss general approach
- With CMS input, decide which checklist to use. If state-specific criteria are being used, talk to RO about how to best incorporate.
- Determine the frequency of MMIS IV&V Progress Reports (quarterly minimum frequency, including progress reports prepared for certification review)
- Document decisions made with CMS in the PPU document
- Discuss reuse opportunities with CMS

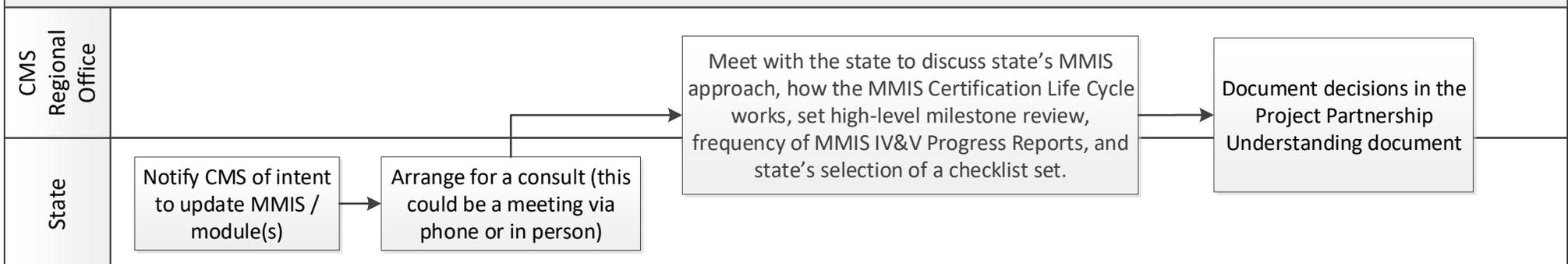
Artifacts State Must Produce

Project Partnership Understanding

Who Is Involved

- State
- CMS

Workflow





2. State Goals and Objectives & PAPD

Back to Certification
Life Cycle

Description

The state considers its vision of the future and its mission and objectives, and sets goals and objectives for the new or updated MMIS.

The state prepares a Planning Advanced Planning Document (PAPD) if it chooses to do so. The PAPD is not required of states.

Activities State Is Expected to Perform

- Document the state goals and objectives
- Prepare the PAPD, if the state chooses to do so
- Submit PAPD to RO

Artifacts State Must Produce

Goals and objectives

Who Is Involved

State

Workflow

State

Document state goals and objectives

Prepare PAPD, if state chooses to do so (state will submit to CMS RO with the draft IV&V RFP).



3. IV&V Draft Request for Proposal

Description

The state drafts a request for proposal (RFP) for an independent verification and validation (IV&V) contractor, or drafts a modification to an existing contract. CMS expects the state to include certain standard language in the RFP to ensure that the contractor:

- Is truly independent from the state agency managing the MMIS project
- Does not also perform software testing
- Is tasked to do technical design reviews (including security, performance management, claims editing, and others)
- Is tasked to perform project management reviews
- Reports findings in the form of certification progress reports (including drafts) to CMS and to the state simultaneously

Activities State Is Expected to Perform

- Download a copy of the standard IV&V language (Appendix C of the toolkit)
- Draft IV&V RFP, being sure to incorporate the required standard IV&V RFP language
- Send the draft IV&V RFP to the RO for approval

Artifacts State Must Produce

Draft IV&V RFP

Who Is Involved

State

Workflow

State

Download a copy of the standard IV&V language

Draft the RFP (or contract modification), being sure to include the standard language

Send the draft IV&V RFP (or contract modification) to the RO





4. IV&V RFP and PAPD Review

Description

CMS RO reviews the draft IV&V RFP (or contract modification) to ensure that the contractor will:

- Perform technical design reviews (including but not limited to security, performance management, and claims editing)
- Perform project management reviews
- Submit certification progress reports (including drafts) to CMS and to the state simultaneously

If the state has submitted a PAPD, CMS RO reviews the PAPD and renders a decision to approve or disapprove the funding request.

Activities CMS RO Is Expected to Perform

- Read the entire draft IV&V RFP (or contract modification)
- Check to see if the standard IV&V RFP language has been included
- Check the frequency of progress reports stipulated in the IV&V RFP draft. Is it frequent enough to satisfy CMS, yet not so frequent as to add undue expense and burden on the state?
- Return comments about the draft RFP (or contract modification) to the state
- Review the PAPD, if one was submitted
- Approve or disapprove the PAPD. Notify the state, including comments if the PAPD was disapproved

Artifacts CMS Must Produce

- Approval or disapproval of the draft IV&V RFP (or contract modification) and, if the draft is disapproved, explanatory comments
- If PAPD was submitted, notice to the state that the PAPD has been approved or disapproved, and if the PAPD is disapproved, explanatory comments

Who Is Involved

CMS RO

Workflow

CMS RO

Read the entire draft IV&V RFP (or contract modification) and verify that the standard IV&V RFP language is included

Return comments about the draft RFP (or contract modification) to the state

Review the PAPD (if one was submitted)

Approve or disapprove the PAPD; notify the state, including comments if the PAPD was disapproved



5. IV&V Contract

Back to Certification Life Cycle

Description

The state enters into a contractual agreement with the IV&V contractor. The same CMS-supplied language used for the RFP must be included in the contract.

The state may choose to have the IV&V contractor assist with MITA SS-A and RFPs / RFIs. Otherwise, the IV&V contract does not need to be in place until a few months before the first MMIS IV&V Progress Report.

Any changes to the IV&V contract that alter the scope of the contract will need to be reviewed and approved by the CMS Regional Office.

Activities State Is Expected to Perform

- Activities consistent with the state’s own procurement processes
- Send contract to RO for approval

Artifacts State Must Produce

Signed contract with IV&V contractor

Who Is Involved

State

Workflow

State

State follows its own procurement process

Sends contract to CMS Regional Office for approval.





6. MITA State Self-Assessment and Concept of Operations

Back to Certification Life Cycle

Description

The state uses the MITA State Self-Assessment (SS-A) to document its current MITA maturity level, a future maturity, and a course of action for achieving the future maturity. A Concept of Operations is prepared for the Medicaid enterprise system.

The MITA SS-A will be attached to the Implementation Advanced Planning Document (IAPD) and reviewed during the Project Initiation Milestone Review.

The state may choose to have its IV&V contractor perform the self-assessment.

Who Is Involved

State

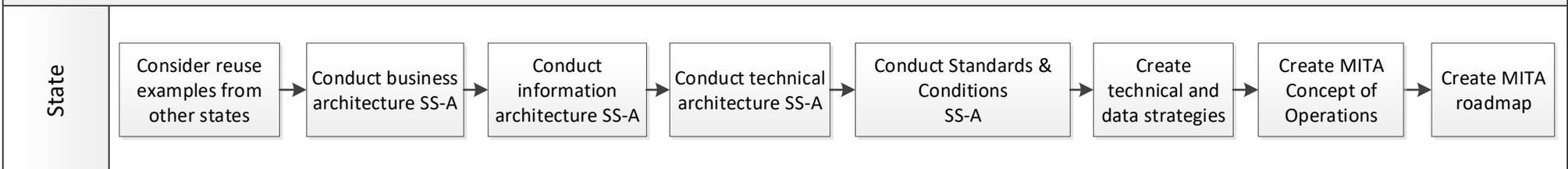
Activities State Is Expected to Perform

- The state is encouraged (though not required) to refer to examples from other states
- Document state’s MITA current and future maturity level in four areas: business architecture, information architecture, technical architecture, and the Standards and Conditions for Medicaid IT
- Create technical and data strategies
- Create MITA Concept of Operations
- Document transition plan for moving from current maturity level to future maturity level
- CMS encourages states to use the eSS-A template (see toolkit appendices) for submitting the SS-A scorecards to CMS RO

Artifacts State Must Produce

- Completed MITA State Self-Assessment, including current and target maturity levels for the Standards and Conditions for Medicaid IT and business, information, and technical architectures
- MITA Concept of Operations
- MITA Transition Plan
- MITA Technical Strategy
- MITA Data Strategy

Workflow





7. MMIS Concept of Operations

[Back to Certification Life Cycle](#)

Description

The state produces an MMIS Concept of Operations (ConOps) that describes the technical solutions the state has selected and how those will fit with external state and federal IT systems. The ConOps should explain how the state intends to apply the conditions of reuse and modularity.

An MMIS ConOps template is available in the toolkit appendices.

Activities State Is Expected to Perform

- The state is encouraged (though not required) to use examples from other states
- Review the critical success factors and certification checklist criteria
- Refer to the MITA technical and information strategies and roadmap
- Write an MMIS Concept of Operations. Appendix E of the toolkit is a ConOps template the state may use.

Artifacts State Must Produce

MMIS Concept of Operations

Who Is Involved

State

Workflow

State

Consider reuse examples from other states

Refer to Medicaid Enterprise Certification checklist criteria

Refer to MITA technical and information strategies and roadmap

Create ConOps to document MMIS operational concept





8. MMIS and MITA Concept of Operations Consult

Description

The CMS Regional Office and the state discuss the state's MMIS Concept of Operations and MITA's Concept of Operations.

The consult serves two purposes:

- Gives CMS RO an opportunity to understand the operating concept that will be contained in the forthcoming IAPD.
- Gives the state an opportunity to hear early feedback from CMS about the adequacy of the high-level concept design.

Activities CMS and State Are Expected to Perform

- State: Send copies of the documents to CMS
- State: Schedule a consult with CMS RO
- CMS RO: Review the documents in detail
- Both: Meet to discuss the MMIS Concept of Operations and the MITA Concept of Operations draft documents
- Both: Determine if the revisions are necessary
- State: Make any necessary revisions to the documents

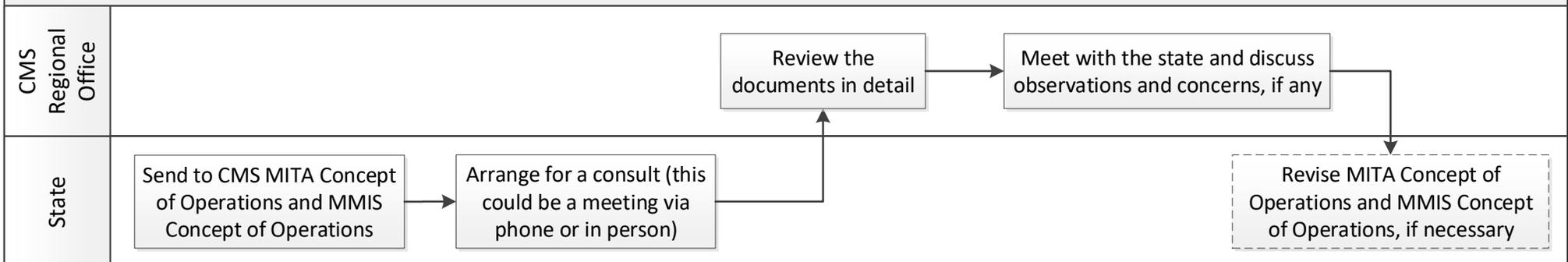
Artifacts State Must Produce

- Revised MITA Concept of Operations, if necessary
- Revised MMIS Concept of Operations, if necessary

Who Is Involved

- CMS Regional Office (RO)
- State

Workflow





9. Draft Request for Proposal

[Back to Certification Life Cycle](#)

Description

The state refers to certification checklists, critical success factors, and the MMIS and MITA Concept of Operations documents when preparing a request for proposal (RFP).

If the state is planning to release modules or sets of modules on a staggered schedule, only the RFPs for the first set of modules to be released need to be ready for the Project Initiation Milestone Review. The other RFP drafts can be reviewed by CMS at a later time.

Who Is Involved

State

Activities State Is Expected to Perform

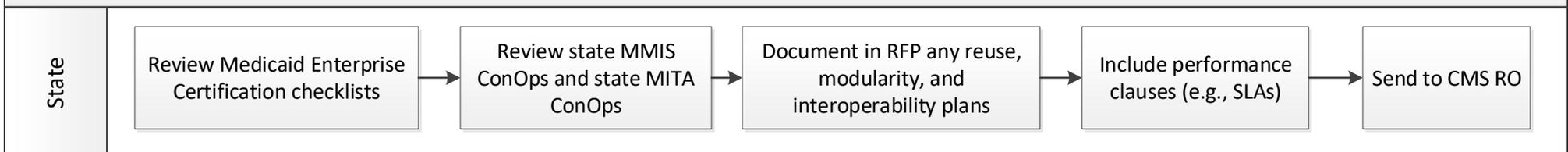
- Draft RFP(s), taking into consideration the MMIS certification checklists criteria
- Include the certification checklists
- Review and use information from state's MITA and MMIS Concept of Operations
- Reuse clauses from similar documents, including interoperability plans and performance clauses
- Send to CMS RO

Artifacts State Must Produce

Draft RFP with the following, provided they are enforceable according to state law:

- Defined goals and objectives
- To-be environment requirements (business, architecture, data), including reuse, interoperability, and modularity requirements
- Conditions tying compensation to meeting or exceeding defined goals (e.g., service level agreements)
- Reservation of right for state to approve and/or remove subcontractors
- Requirement that contractors cooperate with other contractors (including IV&V contractor) and not impede progress on project as a whole
- Requirements found within the Medicaid Enterprise Certification Checklists

Workflow





10. Project Management Plan

Description

The state prepares the following:

- Project management plan, including budget
- System Development Life Cycle (SDLC)
- Project schedule
- Risk register and risk management plan

The state should also ensure that all documents required for the upcoming Project Initiation Milestone Review (e.g., the system security plan and privacy impact analysis) are written. (Refer to toolkit appendices for a list of artifacts required for the first milestone review.)

Who Is Involved

State PMO

Activities State Is Expected to Perform

- The state is encouraged (though not required) to use examples from the other states
- Write project management plan, SDLC, schedule, and risk register
- Ensure that all necessary artifacts are ready for the Project Initiation Milestone Review

Artifacts State Must Produce

- Project management plan
- Budget
- Risk register (waterfall) / exception plan (agile)
- Schedule (waterfall) / milestones and burn-down charts (agile)
- SDLC
- System Security Plan (SSP)
- Privacy Impact Analysis (PIA)

Workflow

State

Consider reuse examples from other states

Write project management plan, SDLC, schedule, and risk register

Fill out checklists and ensure that all artifacts (including security plan, Privacy Impact Analysis, etc.) are ready for first milestone review



11., 18., 20., 23., 26. Progress Report

Description

Before each milestone review, and periodically throughout the MMIS project, the IV&V contractor assesses the state's progress and creates an MMIS IV&V Progress Report.

For reports immediately preceding a milestone review, the state completes the state sections of the checklists and stores them and the supporting evidence in its own repository. Then the IV&V contractor completes the reviewer sections of the checklists, and completes the IV&V and Programmatic tabs of the MMIS IV&V Progress Report Template. The IV&V contractor then submits the reports and checklists simultaneously to the state, to the RO and to the CMS email address (MES@cms.hhs.gov). For reports not immediately preceding milestone review, the IV&V contractor simply completes the progress report and sends to the state, the RO, and CMS email address.

The state should save the IV&V-completed checklists in its repository as a new version of the checklists. (The checklists should continue to be updated as new versions with subsequent milestone reviews.)

Activities IV&V Contractor Is Expected to Perform

- Fill out reviewer portion of checklists that the state has filled out (for reports immediately preceding a milestone review)
- Complete IV&V and Programmatic tabs of the progress report template
- Attach completed checklists (only for reports prepared for a milestone review)
- Submit the progress report simultaneously to the state, to CMS RO and to CMS certification email address (MES@cms.hhs.gov)
- If the contractor and state have identified particularly good examples of final versions of evidence / required documents, the state should consider sharing them with other states

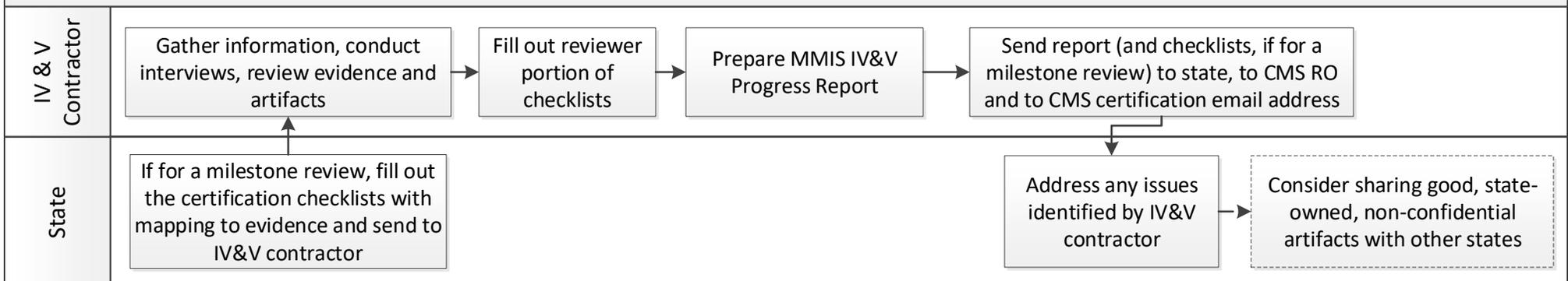
Artifacts IV&V Contractor Must Produce

MMIS IV&V Progress Report

Who Is Involved

- State
- IV&V Contractor

Workflow





12. Submit Implementation Advance Planning Document

Back to Certification Life Cycle

Description

An Implementation Advance Planning Document (IAPD) is a plan that the state uses to request federal financial participation (FFP) for the costs of developing and implementing an MMIS.

In this step, the state prepares an IAPD and sends it to the CMS Regional Office to start the IAPD approval process. The state is encouraged to reuse material from artifacts produced in previous steps.

The Project Initiation Milestone Review will be conducted within 30 days of IAPD submission.

Who Is Involved

State

Activities State Is Expected to Perform

- Draft IAPD, drawing from the documents previously written (Project Management Plan, MITA ConOps, MMIS ConOps, and others)
- Include state’s MITA self-assessment and security plan as attachments
- Send IAPD to the CMS Regional Office to start the IAPD approval process

Artifacts State Must Produce

IAPD, which includes:

- Statement of need and objectives
- Requirements
- Alternatives analysis
- Project management plan
- Proposed project budget and cost distribution
- Statement of security / interface and disaster recovery requirements
- Assurances
- Compliance with the Standards and Conditions for Medicaid IT

Workflow

State

Draft IAPD, drawing from previously written documents

Attach the SS-A to the IAPD

Send IAPD to CMS Regional Office





13 a. Project Initiation Milestone Review

Description

This review ensures that the state has documented goals and objectives, a solid MITA self-assessment and roadmap, a technical Concept of Operations, and project management in place. CMS evaluates the state’s business case, Project Management Plan, and RFPs. CMS may choose to send test cases or scenarios to the state to be included as part of the milestone review. The outcome of the review informs the RO’s decision regarding release of FFP funds to the state for design and development of its MMIS.

Activities State Is Expected to Perform

- Ensure IV&V contractor has submitted MMIS Certification Progress Report and all relevant IV&V checklists
- Make evidence available to CMS

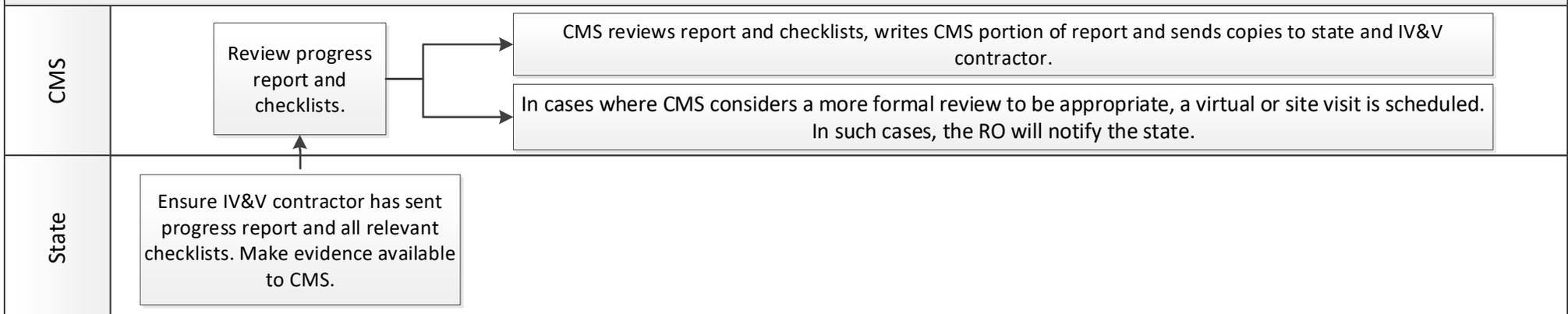
Artifacts That Will Be Reviewed

- State goals and objectives
- Draft RFP(s)
- MITA Concept of Operations
- MITA Technical Management Strategy
- MITA Data Management Strategy
- MMIS Concept of Operations
- MITA self-assessment / MITA roadmap
- System Security Plan
- Privacy Impact Analysis
- Project Management Plan
- Schedule (or milestones and burn-down charts)
- Risk management plan and risk register

Who Is Involved

- State
- CMS

Workflow





14. IAPDU Review and Approval

Description

If, over the course of a long project, the state needs to update the IAPD, CMS reviews the updated document in order to determine whether to approve the revision. Another Project Initiation Milestone Review is not necessary. (See APD guidance for thresholds that trigger an update to an APD and for detailed explanation of the APD process.)

This activity also applies to RO annual review of an IAPD that has already been approved.

Activities CMS Is Expected to Perform

- Follow existing APD process to review the Implementation Advanced Planning Document Update (IAPDU)
- Determine whether to approve it
- Notify the state of the decision; if CMS disapproved the document, mention what needs to be corrected
- Re-review IAPDU and, if state has addressed CMS concerns, approve it

Artifacts State Must Produce

IAPDU

Who Is Involved

CMS

Workflow

CMS RO

Review state's updated IAPDU

Approve / disapprove

If approved, release funding





15. State Procurement Process

[Back to Certification Life Cycle](#)

Description

The state enters into contractual agreement(s) with contractors to develop, test, integrate, and otherwise update or transform the state's MMIS system. CMS Regional Office reviews the contract.

The contract must be approved by CMS RO.

Activities State Is Expected to Perform

- Follow the state's procurement processes
- Send contract to CMS Regional Office for approval

Artifacts State Must Produce

Signed contract with MMIS contractor(s)

Who Is Involved

State

Workflow

State

State follows its own procurement process

Send to CMS Regional Office for approval





16. Requirements and Preliminary Design

Description

The state documents system requirements, system design, and a plan for testing the requirements. Requirements and design may be refined over the course of the development effort.

In an agile implementation, these requirements may take the form of a backlog of user stories. Certain design documents are necessary even if the state is using an agile method (for example, interface design and database design).

Any future changes to requirements and design would be evaluated against the baselines created in this step.

Activities State Is Expected to Perform

- Review requirements contained within the MMIS certification checklists
- Refer to state’s MITA Concept of Operations, technical and data strategies, and roadmap to elicit requirements and ensure that MMIS requirements integrate with MITA plans
- Document system requirements, design, and test plans

Artifacts State Must Produce

- System Design Document / backlog of user stories (or, if the state is purchasing a COTS system, an interface design document)
- Information System Security Assessment
- Test Plan
- Interface Control Document
- Database Design
- Data Conversion / Management Plan
- Implementation Plan
- Contingency / Disaster Recovery Plan
- Data use / exchange interconnection security agreements

Who Is Involved

State

Workflow

State

Review certification checklist criteria

Refer to MITA strategies and Concept of Operations

Document requirements, designs, and how requirements will be tested





17. Requirements and Design Review

Description

The IV&V contractor reviews requirements and designs as part of the state's system development life cycle (SDLC).

If it is using a waterfall approach, the state may only have one requirements and design review with its IV&V contractor. If using an agile methodology, the state may choose to have one review or conclude each epic or a set number of sprints with a review of the refined requirements and/or designs.

Who Is Involved

- IV&V contractor
- State

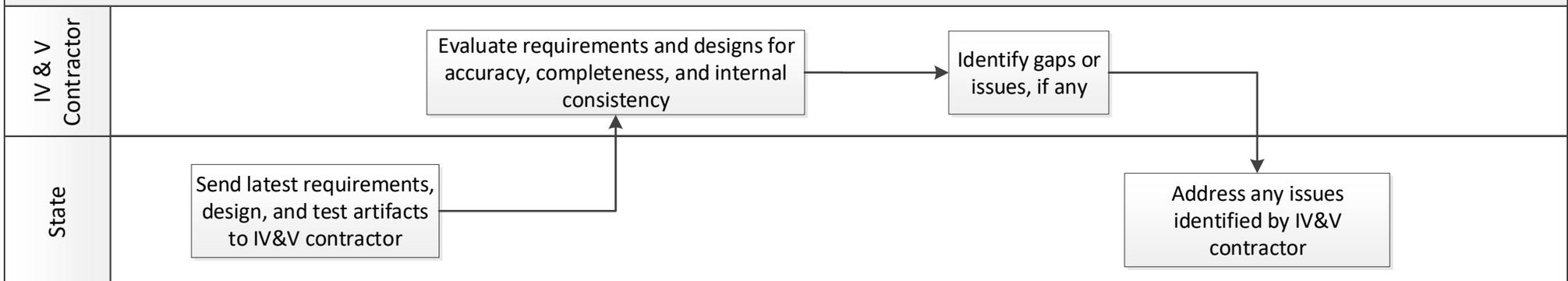
Activities IV&V Contractor Is Expected to Perform

- Review requirements and designs
- Evaluate state's requirements, design, and test plans for completeness, accuracy, and internal consistency
- Identify gaps and issues, if any, for state to address

Artifacts IV&V Contractor Must Review

- System Design Document or, if the state is purchasing a COTS system, an interface design document
- System Security Plan
- Information System Security Assessment
- Test Plan
- Interface Control Document
- Database Design
- Data Conversion / Data Management Plan
- Implementation Plan
- Contingency / Recovery Plan
- Data Use / Exchange Interconnection Security Agreement

Workflow





19. Review Progress Report

Description

The MMIS IV&V Progress Report has three sections—an IV&V tab, a Programmatic tab, and tab for CMS response and comments.

In this activity, CMS reviews the IV&V contractor sections of the report and responds with questions to the state, if necessary. CMS enters comments and concerns, if any, into the CMS portion of the MMIS IV&V Progress Report.

The frequency of these reports is set by the schedule in the IV&V contract with the state, with CMS requiring at least a quarterly report. Quarterly reports can be used in preparation for a milestone review.

Activities CMS Is Expected to Perform

- Read the MMIS IV&V Progress Report in detail
- Talk to the state or IV&V contractor about questions or concerns
- Document comments and concerns, if any, in the CMS portion of the MMIS IV&V Progress Report and send a copy to the IV&V contractor and to the state

Artifacts CMS May Produce

Comments in the CMS portion of the MMIS IV&V Progress Report

Who Is Involved

CMS

Workflow

CMS

Review the MMIS IV&V Progress Report in detail

Talk to the state or IV&V contractor about any issues / concerns

Document CMS comments / concerns in the CMS portion of the MMIS IV&V Progress Report and send a copy to the state and to the IV&V contractor



21. Develop

[Back to Certification Life Cycle](#)

Description

The state and its contractors develop or upgrade the state's MMIS according to their processes.

Activities State Is Expected to Perform

Develop / upgrade MMIS functionality

Artifacts State Must Produce

MMIS working code

Who Is Involved

State

Workflow

State

State follows its development processes

22. Test and Evaluate

Description

The state and its contractors test and evaluate the functionality and performance of the MMIS. This includes tracing which requirements were tested and documenting test results.

For agile approaches, testing may take the form of user product validation. (This method may be used by waterfall approaches as well.)

Activities State Is Expected to Perform

- Test and evaluate MMIS functionality; automated testing and continuous integration is encouraged
- Generate test reports / product validation reports showing how the system was tested against documented requirements / user stories

Artifacts State Must Produce

Test or product validation reports (with mapping to requirements)

Who Is Involved

State

Workflow

State

State tests and evaluates the MMIS modules using its testing processes

Documents test results or product acceptance against requirements / user stories



24. Operational Milestone Review(s)

Description

The purpose is to evaluate the functionality and security of MMIS / modules ready for deployment. Reviews are scheduled by mutual agreement between the state and CMS. The review covers only the set of modules ready for deployment. Separate Operational Milestone Reviews are conducted for future cohorts of modules when they are ready for deployment. Before review can occur, the IV&V contractor must have sent a progress report with completed checklists to the state, the RO and the CMS certification email box, and the state must have made all required artifacts and evidence available to CMS. CMS may choose to send test cases or scenarios to the state to be included as part of the milestone review.

Who Is Involved

- State
- CMS

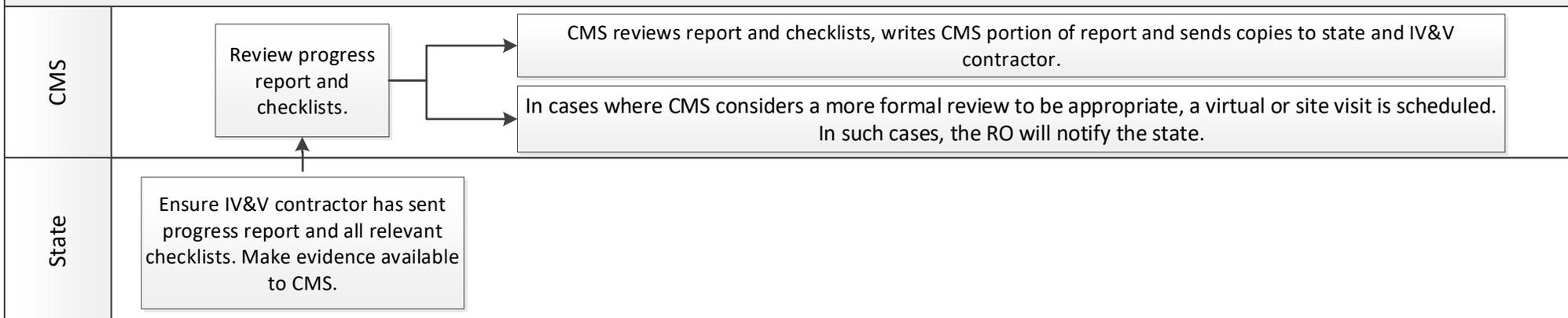
Artifacts That Will Be Reviewed

- Working module(s)
- System Security Plan and Privacy Impact Analysis
- Schedule (or milestones and burn-down charts)
- Risk management plan and risk register
- Test plan
- Incident Management Plan
- Configuration Management Plan
- Information Security Risk Assessment
- Database Design
- Data Conversion / Management Plan
- Contingency / Recovery Plan
- Test Reports / Validated Product Reports
- System Design Document
- System Requirement Document / backlog of user stories or use cases
- Product documentation
- HIPAA Statement

Activities State Is Expected to Perform

- Ensure IV&V contractor has submitted MMIS Certification Progress Report and all relevant IV&V checklists
- Make evidence available to CMS

Workflow





25. Certification Request

Description

- At some time before (or after) the six-month operational point, the state sends a package of information to the CMS RO. This package must include
- A certification request letter (see MMIS Certification Request Letter Template),
 - A proposed date for certification review (included in certification request letter), and
 - A copy of the state’s acceptance letter addressed to the system developer indicating that the system or module was accepted as fully operational at least six months prior to the requested certification review date.
 - CMS will respond with an official letter. Together CMS and the state will set dates for the MMIS Certification Final Review.

Activities State Is Expected to Perform

- Send formal letter to CMS requesting certification of the state’s MMIS or set of modules
- Ensure that IV&V contractor has sent completed checklists and progress report to RO, state and CMS certification mailbox
- Make evidence available to CMS

Artifacts State Must Produce

- A request letter (see Certification Request Letter Template) that includes:
- The date the system / module(s) became fully operational
 - A copy of the state’s letter to the MMIS contractor or state development team accepting the system / module(s)
 - A proposed timeframe for the review
 - A declaration that the state’s MMIS meets all requirements of law and regulation:
 - 42 CFR 433.117 for all periods for which the 75% FFP is being claimed
 - All necessary documentation required for MMIS Certification Final Milestone Review, including a copy of the latest New Medicaid Card Program Readiness Report, has been provided to CMS, per the Medicaid Enterprise Certification Toolkit.
 - Issues Explanation of Benefits (EOBs) on a regular basis for all periods for which 75% FFP is being claimed, in accordance with the provisions of Section 10 of P.L. 95142, which amends section 1903(a)(3) of the Social Security Act
 - Is ready for certification, based on the state’s evaluation using the checklists in the Toolkit
 - The system is routinely backed up
 - Adjudicates claims and information required for payment of services in accordance with all provisions of 42 CFR 447 and the approved state Medicaid plan
 - Generates up-to-date and accurate Transformed Medicaid Statistical Information System (T-MSIS) data
 - Exercises appropriate privacy and security controls over the system in accordance with 45 CFR Part 164, P.L. 104-191, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and 1902(a)(7) of the Social Security Act as further interpreted in regulations at 42 CFR 431.300 to 307

Who Is Involved

State

Workflow

State

Send formal request for CMS to certify the MMIS / set of modules



Receive response from CMS



27. MMIS Certification Final Review

Description

The purpose of this review is for CMS to evaluate the MMIS or set of modules in order to determine whether to certify the system / modules and release Federal Financial Participation (FFP) funds to the state for MMIS maintenance and operation. CMS may choose to send test cases or scenarios to the state to be included as part of the milestone review.

Who Is Involved

- State
- CMS Certification Team

Artifacts That Will Be Reviewed

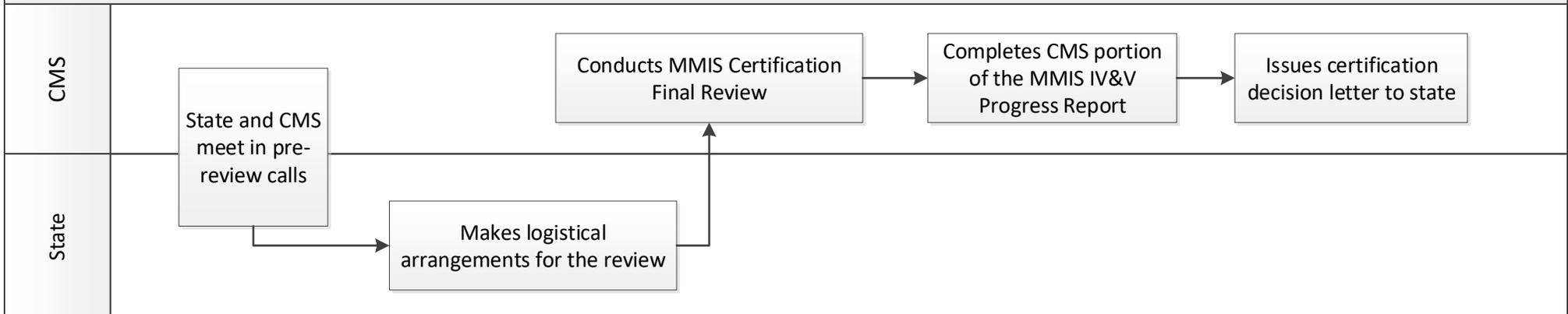
All documents covered in previous reviews may be reviewed in addition to:

- Working MMIS module(s)
- The official certification request letter
- Samples from six months of operating data
- Substantive and representative set of all reports and information retrieval screens (electronic format preferred)
- A list of information retrieval functions and reports for each business area (including a list identifying distribution of the reports and who can access the information retrieval displays)
- Evidence that Transformed Medicaid Statistical Information System (T-MSIS) data requirements are met for timeliness and data quality

Activities State PMO Is Expected to Perform

- Plan logistics for review (granting CMS access to state checklists and evidence no later than two weeks before review, arranging rooms, etc.) and manage review schedule

Workflow



The Life of Checklists

During the initial consult with CMS, the state and CMS make a preliminary decision on a checklist set that fits the state's approach: either the MMIS Module Checklist Set, or in rare cases, a checklist set customized by the state. Both sets have the same criteria; they are simply organized differently. The custom option must be approved by CMS, as it is for exceptional cases where a state is taking an unusual or particularly innovative approach.

