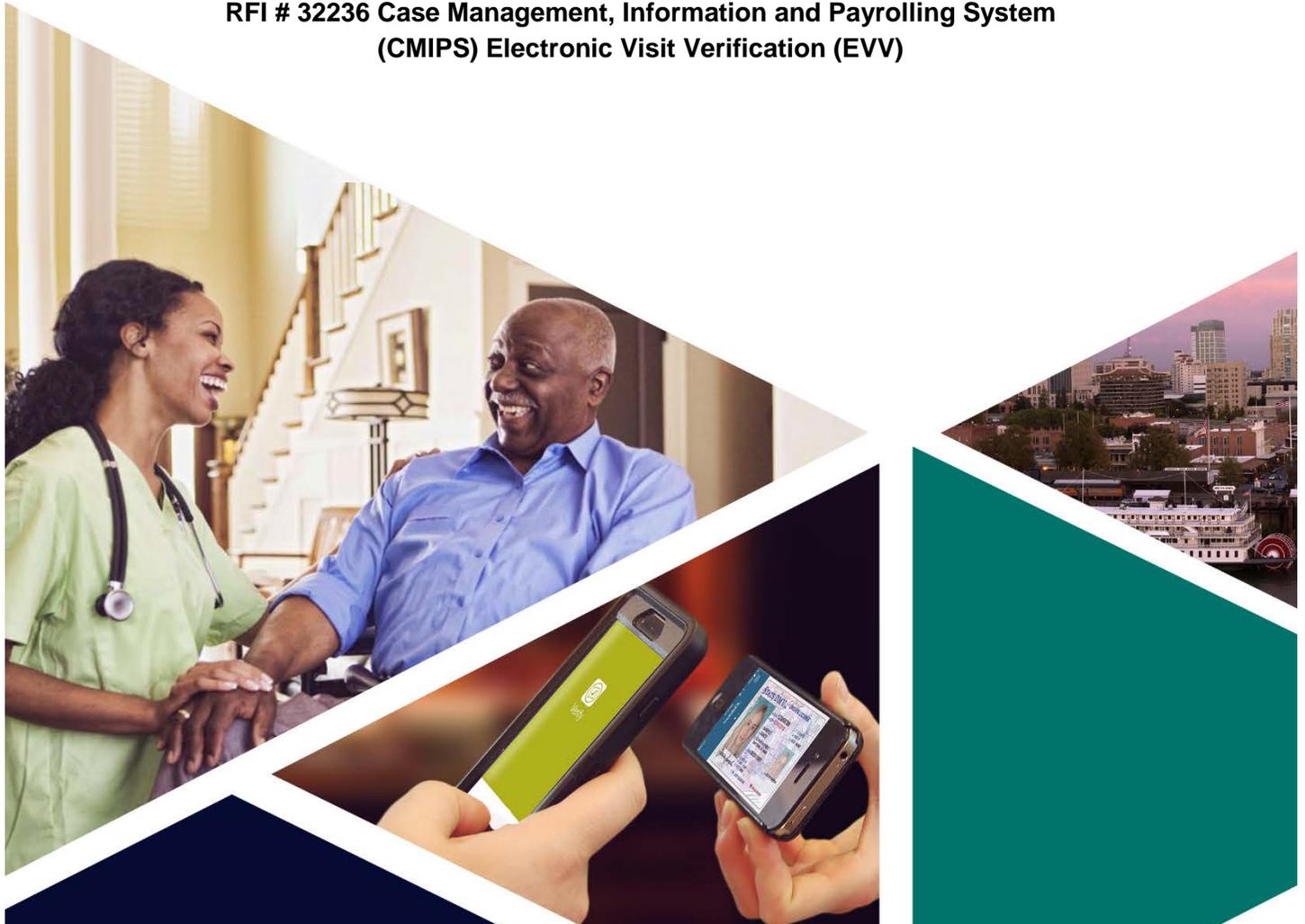


**California Health and Human Services Agency
Office of Systems Integration**

Request for Information (RFI)

In Response to:

**RFI # 32236 Case Management, Information and Payrolling System
(CMIPS) Electronic Visit Verification (EVV)**



Submitted by:

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Our Mission

To simplify, protect and secure people’s lives.

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Cover Letter

December 6, 2017

Mr. Albert De León
Acquisitions & Contracting Services Division
Office of Systems Integration
2495 Natomas Park Drive, Suite 515
Sacramento, California 95833

Subject: RFI #32236 CMIPS Electronic Visit Verification (EVV) Response

Dear Mr. De León:

Please find attached our response to your Request for Information (RFI) for RFI #32236 CMIPS Electronic Visit Verification (EVV) Response.

This cover letter is signed by Mr. Robert Eckel, who is authorized to legally bind MorphoTrust to fulfill the performance and pricing commitments outlined in this proposal. Per your request, we have included our name, address, telephone number and fax number; and contact information including the name, title, address, phone number, fax number and e-mail address of our primary contact person for this RFI.

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Thank you for your time and consideration.

Sincerely,



Robert Eckel
President and Chief Executive Officer

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Executive Overview

THE ROLE OF IDENTITY IN EVV

MOBILE IDENTITY VERIFICATION AT POINT OF PROVIDER/CAREGIVER ENROLLMENT

At MorphoTrust, we believe identity verification is a critical element for any Electronic Visit Verification (EVV) solution. Without the element of identity verification, it is difficult to guarantee that the right patient receives the right treatment from the right provider at the right time in the right place.

There are many technologies that are used to assert one's identity, such as PINs, Passwords, geo-tagging, and fixed-position QR code scanning. However, we believe that positive identification of the Provider (and the Recipient) can be achieved with confidence only by using a form of biometrics. Many mobile based EVV solutions assume that the person holding the mobile device is the approved Provider, but the MorphoTrust solution using biometrics positively identifies the Provider.

A 21st Century Cures Act EVV system must electronically verify the following in order to be compliant:

- Type of service performed
- Who received the service
- Date of service
- Location of service delivery
- Who provided the service
- When the service begins and ends

MorphoTrust is currently engaged in a variety of identity programs whereby the identity of the individual can be positively confirmed using biometrics. These

programs include the NIST sponsored program for securing access to state benefits and tax returns through biometric credentials <<https://www.nist.gov/itl/tig/pilots>>.

Using this technology in an EVV program can lead to improved patient/provider outcomes improving the overall effectiveness of the program. Ensuring the enrolled providers are who they say they are is key to ensuring the efficacy and safety of caregiving.

Capturing transactional data is of course important. Capturing location data is important. But capturing identity attribute data is necessary to ensure people are who they say they are, and to subsequently run new types of reports and make decisions using analytics that can more easily identify and help staff recognize potentially fraudulent behavior.

MOBILE IDENTITY VERIFICATION AT POINT OF PROVISION OF SERVICES

MorphoTrust does not provide a complete end-to-end EVV solution but rather components that can be utilized by almost any mobile-based solution to integrate biometrically proven identity verification into any enrollment or point-of-service processes such as those used in EVV processes. In addition, MorphoTrust's eID technology can provide positive identification at the enrollment process for both Providers and Recipients.

What is MorphoTrust® eID?



The eID is the 1st and only service allowing consumers to create a personal online credential by authenticating themselves against their MVA record.

It's Personal:

- A highly trustworthy online identity credential
- Resides on an individual's smartphone
- Puts full control of PII in the hands of the individual

It's The Future:

- Accepted in lieu of traditional Usernames/Passwords
- Enables the future of identity in which users choose which credentials they want to use
- Minimizes the number of times an individual's PII is copied and stored across the internet... reducing breach risk

This state of the art technology combines multiple user inputs to disposition the individual's asserted identity. MorphoTrust asks the individual to first provide a state-issued and authenticated ID card. Then we ask the user to submit a selfie, where it is compared against the portrait on the ID card. If the picture matches the individual presenting the card, then the state is able to deduce the person is who they say they are. Once successfully dispositioned, enrollment data is then sent to the MMIS and other workflow engines for eligibility determination.

The agency, providers, and beneficiaries can also log into the agency website without the need for a separate username/password. Over time, this could

potentially save the staff hundreds of hours in resetting passwords, and thousands-of dollars implementing technology to support passwords, while promoting and extending self-service mindset to the population of users, increasing customer satisfaction.

Once the provider/caregiver is enrolled in the program using their identity attributes (a description of this follows), the MorphoTrust-enabled mobile solution is used to ensure that the right provider is at the right location at the right time providing the right services to the right patient. This conceptual functionality would have the following, user friendly workflow:

- When provider/caregiver shows up at the patient's location to deliver services, they open the EVV application by capturing a selfie and using facial recognition technology to unlock the app
- The location is geotagged to ensure that the provider/caregiver is at the proper location
- The provider/caregiver then (optionally) scans the patients state issued driver license/identification card, benefits card, or MorphoTrust-issued digital ID.
- The patient data is encrypted and transmitted to the agency system of record to confirm eligibility and available services
- The app then tracks services provided and returns data to the agency system of record for expedited claim processing or audit purposes

OUR IDENTIFICATION TECHNOLOGY FOR EVV

MorphoTrust technologies are easy to integrate into mobile applications and are designed to be simple to use by employing a standard smart phone look and feel - allowing anyone to easily navigate the interface. A facial image and/or Personal Identification Number (PIN), locks and unlocks the application for the authorized provider if deemed necessary during our collaborative solution design discussions in the future. Base applications using our identification components would have the following functionality:

- Validating that a state-issued DL or ID card presented by a Medicaid provider/caregiver is authentic
- Capturing a facial image of the provider/caregiver
- Testing to ensure the facial image being captured is in fact that of a real-live person (that is, "Liveness")

- Submitting the facial image and DL/ID data to the agency for an identity verification and receiving the acceptance or rejection back from the agency
- Submitting the document image to MorphoTrust's Verification Service for analysis (i.e., SaaS service)
- Submitting the verification response to the provider and/or Medicaid for logging

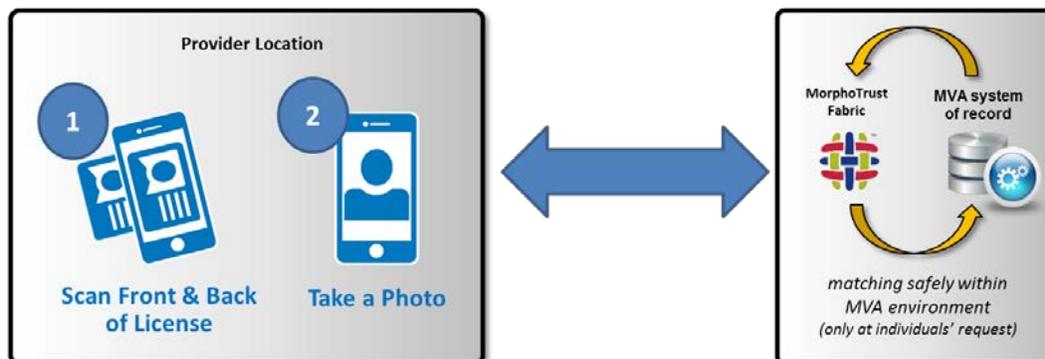


Figure 1: Sample Identity Verification Enrollment Workflow

A high level overview of a simple identity verification enrollment workflow for Medicaid beneficiaries. MorphoTrust's solution easily extends to include other activities.

The technology will accelerate the ability for providers to greet and verify beneficiaries. Our solution is light, fast, and efficient, and is designed for minimal impact on day-to-day operations in health care provider locations. The entire verification process takes only a few seconds.

MORPHOTRUST EXPERIENCE WITH THE STATE OF CALIFORNIA

MorphoTrust powers the technologies behind some of California's most important programs. The following is where you can find our innovation.

DEPARTMENT OF MOTOR VEHICLES (DMV) CARD ISSUANCE:

MorphoTrust has enjoyed working with the CA Department of Motor Vehicles (DMV) for over 55 years, with their latest driver's license (DL)/ID design including new security features that better protect the identity of customers and making California one of the states with the most secure and technologically advanced cards in the country.

Under AB 60, we partnered with the CA DMV to establish a parallel DL issuance system to support any California resident who is eligible, regardless of immigration status. Ability to prove identity improves the relationship between community members and the police, and when people can identify themselves with government-issued IDs, they can open bank accounts, which reduce the risk that they will be targeted by criminals according to the National Immigration Law Center.

We successfully implemented a new Motor Voter protocol to help the DMV meet its mandate to automatically register eligible California residents to vote when they obtain or renew a driver's license, or a state identification card. The new protocol is intended to streamline the process of signing up to vote and encourage more participation in elections.

California is one of over 30 states that use a central issuance credential production to issue their DL/IDs. Central issuance ensures maximum security throughout the issuance process, giving the DMV the time needed to fully vet applicants and ensure they have not already obtained a credential under another or even multiple identities. It also allows the DMV to take full advantage of their investment in the advanced card materials and security features available through this method of production.

DEPARTMENT OF JUSTICE (DOJ)

MorphoTrust is one of the largest suppliers of live scan fingerprinting systems in the state of California. In support of these systems we have personnel strategically positioned in both Sacramento and Southern California to support interfacing with CA DOJ on both daily operation and changes.

COUNTY SHERIFFS, POLICE DEPARTMENT'S, DEPARTMENT OF CORRECTIONS & REHABILITATION AND COUNTY JAILS

MorphoTrust's TouchPrint Enterprise (TPE) live scan systems are used at various California County Sheriff, Police Department, Department of Corrections & Rehabilitation and County Jails locations throughout the State to electronically capture and transmit fingerprint and palm print data for booking, which replaced the time consuming and messy ink and paper method. Law enforcement and public safety agencies nationwide use our TPE solutions to verify and manage the identity of persons of interest from the moment of booking, through case management, and release. Our live scan solutions make law enforcement work safer, more effective and efficient, while securing and protecting the lives of the American people.

ADDITIONAL BACKGROUND OF MORPHOTRUST

MorphoTrust has learned from its extensive experience providing innovative, anti-fraud solutions to state governments that identity lies at the center of the discussion. And today, with mobile technology, biometric identity has never been easier to establish. Our solutions allow the use of ubiquitous smart phones and tablets to capture facial images and demographic data which can then be sent via Wi-Fi or cellular connection for comparison with the identity system of record - in this case, California Health and Human Services Agency (HHSA). This is a model we pioneered and are using extensively throughout the country and can be tailored specifically to California's specific program imperatives at relatively modest cost.

Our DMV customers in the U.S. also use our facial biometrics technology to detect and prevent identity theft and our mobile identity solutions allow citizens to conduct secure transactions quickly and conveniently. Federal agencies such as the Department of Defense (DoD), the Federal Bureau of Investigations (FBI), and the Department of State (DoS) use the MorphoTrust multi-modal biometric platform in some of the world's largest biometric programs, which when combined exceeds 600 million records.

This rigor and trust built through the DMV's processes and investments could also offer HHSA the most critical piece of an anti-fraud system... identities it can trust. However, our solution is not dependent upon the use of these identities and can be implemented without the use of any DMV record. We simply use this example to illustrate how other jurisdictions are utilizing the proven identities in the DMV system for other identity use cases.

WHO CARES / WHY DOES THIS MATTER

No one understands the value of this asset better than MorphoTrust. We have partnered with the majority of U.S. DMVs for over 60 years to build the processes and technology used in their secure identity and credentialing programs. And today, we are building bridges with technology to unlock the value of these trusted identity repositories for other state agencies.

The foundation of this approach is MorphoTrust Fabric, which allows State DMVs to manage identification requests coming from relying parties such as state Health and Human Services agencies (HHS). MorphoTrust Fabric may be used in place of or as a complement to the Agency-provided web service described in the RFI as it is designed to receive and respond to identity verification requests very quickly and securely on a transaction by transaction basis. However, its unique employment works to eliminate the need for any HHSA data export or transfer across agencies. Instead, MorphoTrust Fabric scores the matching of demographic data and a 1:1 match of the beneficiaries' photos with those on record in the DMV's system of record.



Figure 2. MorphoTrust Cornerstone Philosophy – Augmenting Identity

To fully understand WHO you are dealing with, the individual should be able to provide an example of one or more of the identity asset descriptions.

SUMMARY

Trusted identities and their attributes offer obvious security opportunities for user verification and fraud mitigation. In addition, they provide the foundation elements needed to achieve enhanced customer service between providers and those that are seeking health services with the best of intentions. Should this be realized in a pilot or State-wide application, it will harness the power of trusted identities to accomplish both strategic outcomes with the same core investment.

MorphoTrust’s vision of the future for HHS operation, includes expedited, self-service access to the program that minimizes the requirement for brick and mortar locations, and staff intervention, while guarding against fraud.

MorphoTrust looks forward to discussing how we can be your partner in protecting the security and integrity of the EVV program for the residents of California. We are currently working with a variety of complete EVV solution providers such as SanData, Conduent, CGI, First Data, PCG, Centric Consulting, Accenture and others on the integration of our Identity technologies into a complete EVV solution.

Easy for patients and providers, effective in fighting fraud, delivered by a company with a proven track record of success in large-scale credentialing and identity management programs—our innovative approach is the definition of “Best Value” for California.

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MorphoTrust Response to Attachment A CMIPS RFI #32236 Questions

1. Describe how your company delivers this type of electronic verification solution or service in similar Medicare and Medicaid settings, or other similar health care settings for consumer directed personal care and/or home care service delivery. Include a description of the population characteristics of individuals currently served by your system(s) and include the number of members.

MorphoTrust solutions augment EVV solutions with unique, flexible technologies that introduce **identity verification** and related **identity attributes** to both the enrollment workflows and point-of-service transaction processes. The focus is to ensure: 1. The provider is the actual person he or she claims to be (so the system can determine if he or she is the qualified provider), 2. The beneficiary is the actual person eligible to receive the services to be provided), and 3. The overall quality of the transactional data being collected, in order to help drive more accurate analytics – either now or later.

2. Provide a detailed description of the EVV System:

a. Functionality of the system including the devices, methods of data collection, technology and infrastructure requirements for both individuals receiving services (Recipients) and service providers (Providers), (e.g., land-line telephones, cell phones, in-home fixed device, tablet, internet, GPS).

MorphoTrust Mobility has encapsulated identity verification technology into mobile-native SDKs and SaaS APIs that perform government-credential (i.e., driver's license/state ID) authentication and biometric matching (i.e., facial recognition based on selfies). When combining document authentication and facial recognition comparison technologies, a true multi-factor, identity-based workflow can be initiated.

Using these capabilities, in conjunction with any incumbent or modernized EVV system to authorize or enable workflows, thus permits the agency to improve the depth and breadth of the transactional data being captured, which then improves

the overall integrity of such data, making future data analytics more accurate and insightful.

b. Describe how your EVV solution could meet challenges inherent to California. Include challenges specific to the large volume of Recipients and Providers and how to address the fact that approximately half of IHSS and WPCS Providers are family members and/or live in the household with the Recipient.

The state will receive numerous solicitations in response to this RFI. MorphoTrust urges the state to incorporate in its EVV solution the spirit of EVV and the 21st Century Cures Act and one of its basic tenets – identity verification – by incorporating “mobile” enablement.

The utilization of any in-house device (such as IVR) or a mobile device (such as a tablet or smartphone with GPS enablement) assumes that “location” verification is a sufficient proxy for “identity”. MorphoTrust acknowledges the baseline value of location-based services, but fundamentally disagrees that “location” is synonymous with “identity”. Integrated into a properly architected mobile application, MorphoTrust can ensure that the INDIVIDUAL qualified and approved to provide service is the person providing service. In certain situations, the state may also wish to ensure that the INDIVIDUAL receiving the benefit is who is the approved intended recipient. Using the same mobile technology stack from MorphoTrust, this is similarly possible.

The only technology component required by the Provider for our solution is access to a smartphone or tablet, and the vast majority of all California providers, including those who are family members or live in the household, will have a smartphone or tablet readily available.

c. Security features of the system that confirms the identity of both the Providers and Recipients and how that data is kept secure.

MorphoTrust Identity SDKs are mobile-native, and protected by a layered security architecture that starts with a reverse-engineering resistant, and debugger-proof code obfuscation software, a secure-encrypted database that protects the PII of the individual that is captured for purposes of initiating a transaction, and can then be integrated into a mobile app that utilizes a design paradigm that automatically locks the app if it is left open too long or “minimized” and can be only opened through the use of a selfie or other biometric input built into the app – not into the phone itself.

- EVV – A provider wishes to become “authorized”
 - Applicant goes to the website to begin the process
 - Receives a QR Code to scan, which brings them to an app download

- Launch app, partially pre-filled with information from the website, additional basic questions are answered
- Take picture of DL front, back
- Take a selfie
- Data and images acquired are sent to the eligibility service
 - Identity information may be verified by sister-agency
- Notification of application process/decision is sent to applicant (SMS, app, email, USPS, etc.)
- Enrollment app is automatically “upgraded” to “transact”

The data once captured is thusly sent securely via a method defined by the agency CIO and the incumbent EVV provider for storage into the central database and system of record. Data is then automatically purged from the mobile acquisition device (i.e., phone/tablet)

d. Data collection, including information identified in this RFI Section 5 Proposed Environment.

Our mobile application would present itself to healthcare providers in a controlled method that can be time-coded and location-coded, and would easily capture all the eligible services for the intended recipient. Identity verification could then enable the desired and authorized workflow or services to be completed.

The following screenshots are representative of how MorphoTrust technology might be integrated into a mobile data-capture platform for providers.

DHHS Applicability – eVisit Verification

MorphoTrust's Authenticated credential-based Home Health Services Attendance Solution (i.e. sample screens)

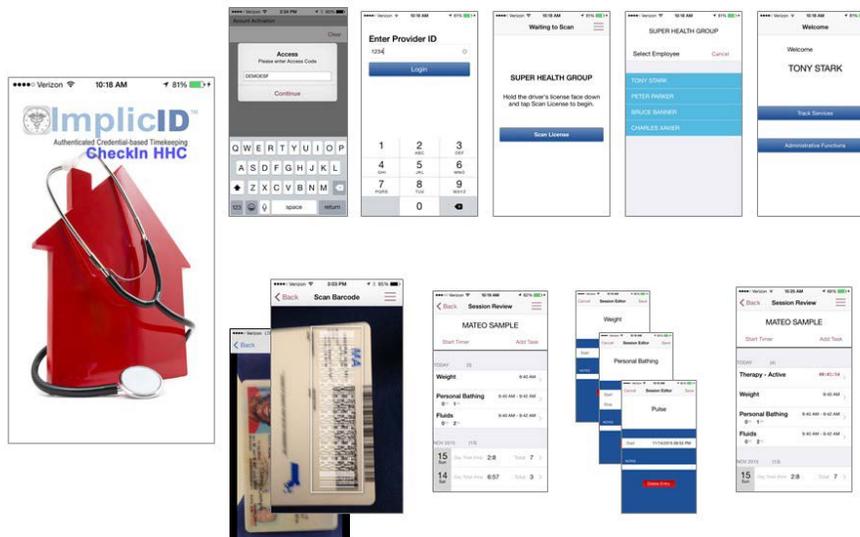


Figure 3. ImplicID Check-in HHC – MorphoTrust's in-house branded HHS demonstration app

Mobile app uses identity-verification technology to unlock an app, confirm beneficiary eligibility, and then assists the provider through a daily task-list and electronic record-keeping

e. Features that address the requirement that allows Providers to modify or “fix” information (i.e., if they forget to check in/out).

The application tracks all inputs and requires that providers complete all inputs before final submission. If a required input has not been completed the app will let the provider know before the information for the service can be uploaded to the system.

f. Features that conform to the concept of being minimally burdensome.

Since the vast majority of the providers utilize mobile phones for a variety of purposes, the concept of using their same mobile phone to submit claims for services rendered should be well received. Most providers always have their mobile phone with them so they won't have any issues for forgotten forms etc.

g. Features of the system that conform to the Americans with Disabilities Act (ADA) and address needs of special populations of Providers and Recipients, such as developmental disabilities and visual/hearing disabled.

Mobile phones are widely used by people with developmental disabilities using features such as large text, speech input, increased contrast, etc. Our apps allow these features to be utilized enabling people with developmental disabilities to use the system.

h. Features of the system that address the needs of special populations that cannot be near electronic devices.

FCC and other federal regulations, require mobile devices (and specifically cellular) to pass certifications before being made commercially available to the general public. Generally speaking, the lower power output of a mobile phone creates smaller magnetic fields and other forms of radiation which would otherwise potentially interfere with medical devices and prosthetics.

i. Features of the system that address the provision of EVV in rural areas where technology infrastructure may be limited or unavailable.

When deployed in a mobile-native manner, the data architecture can be integrated into an app, which by design, securely persists the identity, duration and transaction data as described in <c> above. Once connectivity is made either through Wi-Fi or cellular, the app would then connect to the EVV backend system as designed, and then securely transmit the data. Once confirmed, the data is then purged from the mobile device. The system also has the provision of using a PIN to lock/unlock the app should the user not be able to utilize a biometric login.

j. Additional features the system offers outside of EVV.

MorphoTrust Fabric provides the identity verification infrastructure not only for EVV, but for eID, which enables secure enrollment and sign-on for integrated eligibility systems, .gov portal access, mobile driver licenses, and other agency programs. Through a shared services approach, other state agencies may leverage this infrastructure to create efficiencies and reduce fraud in their programs.

k. Service level metrics including system availability and system capacity.

The MorphoTrust EVV app with identity verification is highly scalable supporting hundreds of thousands of users. Further, given our significant California presence, we've got call center and field resources in place to help ensure high system availability.

I. Contingency plans for system outages or unavailability.

In the unlikely event of a system outage, the MorphoTrust mobile app uses a store-and-forward capability which automatically forwards the data once the outage or lack of connectivity is resolved. Further, identity access to the app may be managed locally (on the device), eliminating the need to connect to the system of record to unlock the app and begin providing services.

m. Flexibility of the system to implement changes and how quickly changes can be made. Describe how the system has built in flexibility such as the ability to meet business needs or make changes through simple configuration set up and/or configuration changes.

MorphoTrust mobile apps are configurable to accommodate business rule changes and may be quickly changed by State IT personnel without incurring costly change orders and system availability delays. We build this capability into all of our programs to meet legislative and regulatory changes quickly and efficiently.

n. Types of analytics and reporting provided.

On-demand and real-time reporting features are focused on accurate data tracking, auditing, and may be used to support automated electronic claims processing. Reports are configurable and may include check in/out data, services provided, length of time for services provided, provider and patient identity authentication and GPS location data. Analytics may be incorporated to measure results against industry standards and to identify service and performance anomalies.

o. Typical account set up time and check in/out time for Providers and Recipients.

The typical provider account set up time through our application is less than 5 minutes; the biometric (selfie) unlock to check in/out of a service appointment takes several seconds; optionally, patient check in using document authentication takes several seconds as well. This also includes geotagging and (optionally) geofencing to ensure that the right caregiver is providing the right services to the right patient at the right location at the right time.

3. Describe if/how the system groups or categorizes tasks to simplify system operation, tracking, Provider and Recipient use, etc.

Once the provider checks in via biometric (selfie) unlock, a real time eligibility check is conducted to confirm provider and patient status and availability of services. Those services are then organized into timed versus non-timed tasks, and the provider simply clicks on the service they want to provide. A separate

box opens upon completion of service to capture notes. Once all services are completed, the provider completes another biometric self-capture to close the service visit and submit the data for audit or claims processing. Optionally, the patient can sign off on the completion of the services via an electronic signature.

4. Describe the system's capability to interface with other systems, for eligibility, timekeeping, payroll or data collection purposes

The MorphoTrust mobile EVV app is designed to be easily integrated with other systems and utilizes standard web interfaces. The app focuses solely on aggregating identity-verified data – that is, the capture of transactional data at “point of transaction” WITH an identity assertion and disposition attribute. This additional data allows the state to not only make specific point-of transaction decisions around workflow, but more importantly, perform systemic data analytics with an increased confidence and ability to forensically identify transactions of questionable behavior.

5. Describe your experience with implementing EVV systems including high-level timelines for implementation and training for all user populations. Describe implementation challenges and lessons-learned. Describe how to overcome implementation challenges. Distinguish implementation(s) for government entities versus private entities. If implemented for state entities, please identify which states and provide contact information.

MorphoTrust has worked in conjunction with other leading EVV solution providers to provide a systemic and integrated response to the inquiring state agencies. The modular MorphoTrust mobile technology has always been presented as a technology enabler to be used in final-mile situations with end-users for purposes of:

1. Distributed, secure, identity-verified mobile enrollment for prospective providers,
2. Distributed, secure, identity-verified mobile enrollment for prospective beneficiaries, and
3. Identity-verified mobile transaction and electronic record-keeping tool to be used in lieu of IVR or card-swipe POS terminals.

We are currently unable to provide reference names since these RFP selection processes are still outstanding.

6. Describe how to overcome implementation challenges inherent to California such as the change management for a large and vulnerable population. Describe mitigation strategies that could be used to address challenges.

MorphoTrust offers a real-time identity verification service that leverages the DMV “driver's license database”, which is the de facto “system of record”.

If optioned accordingly, network access to this data will be sought amongst the directors of the agencies, and once operational usage constraints are agreed to, the infrastructure enablement and agency communication methods can commence.

Since this work is optional, additive, and separate to the basic operational implementation of the core EVV system, such work would be managed against a separate timeline, and integrated when complete. Integration would create additional functionality, and not affect the core usability of the system. Additionally, the mobile app with mobile-native identity verification functionality would persist until such time that the agency decides both forms of ID-V are no longer needed.

7. Discuss strategies you have employed to garner customer satisfaction and include any satisfaction survey data, if available.

At MorphoTrust we are committed to gathering “Voice of the Customer” as part of our programs. In the case of an EVV solution, a “Customer” can be defined both as the agency that purchases and deploys the solution, as well as end-user feedback on the usability and efficacy of the solution. Based on your requirement, we will build feedback mechanisms into the program scope, to help ensure that the solution we deploy has a solid, comprehensive and easy-to-use approach; balancing your needs and desired performance and ultimately ensuring a successful implementation.

As an example of this commitment in the Spring of 2017, MorphoTrust partnered with Radius Global Market Research to gather market data to determine if the U.S. public was ready for the traditional plastic driver’s license to go mobile to support an initiative for the Iowa Mobile Driver License. A survey was issued to nearly 4,000 consumers ranging in age, gender, region and income across the U.S. To qualify for the study, participants needed to own a smartphone and have a valid driver’s license or state identification card. The qualitative and quantitative research asked questions related to the current use of a driver’s license, perceptions of a mobile driver’s license (mDL) available through a smartphone app, benefits of using an mDL and who would most likely be the adopters of this technology.

8. Describe the response to your EVV from a wide range of Recipients and Providers with a wide range of disabilities including blind and deaf and/or low literacy levels.

Our solution puts almost 100% of the burden for EVV on the Provider and not the Recipient. Granted, there are some Providers who might have a limited skill set as they are family members etc., but generally if a Provider has the ability to use a mobile phone they will be able to utilize our EVV solution. Since all transactions

are initiated by first confirming the identity of the Provider using biometrics and a geo-locator using the phone's GPS you will definitely know what Provider provided what service in what location.

9. Discuss ongoing maintenance of EVV systems.

Since our EVV solution is basically a mobile phone app, maintenance would be handled through periodic app updates. There is no hardware requirement other than a mobile phone (Android or iOS) so software maintenance is the only ongoing maintenance portion of the system.

10. Describe if/how the EVV solution can leverage the current IHSS Portal with the ETS feature and the pros and cons of doing so.

Since the IHSS Portal with ETS has been designed to accept input from a smartphone it would be highly desirable (and substantially less costly) to utilize this infrastructure for the new EVV solution.

11. Describe how an EVV solution can be effectively implemented for both the Individual Provider and Agency Provider employment models.

Since the proposed EVV solution is based on a smartphone App, not in CA, it can easily be adopted by both Individual Providers and Agency Providers without significant expenditures on the part of the Providers.

12. Describe your business model (e.g., Software as a Service, Commercial Off-the-Shelf, Modified Off-the-Shelf, custom built, transactional).

MorphoTrust does not have a single business model for the proposed EVV solution and can work with HHSA to develop the most cost effective solution for the new EVV program. This could be transactional, COTS, modified COTS or a hybrid of all.

13. Describe the costs and fee structure of EVV solution(s) for customers with requirements comparable to the IHSS, WPCS, and other HCBS Waiver programs. Differentiate between Individual Provider and Agency Provider employment models. Identify both one-time and on-going costs. Describe how the cost model would scale up to accommodate the large number of IHSS and WPCS Providers.

Since the program has yet to be defined we cannot provide costs for a proposed EVV solution. Once the program requirements have further definition we can provide pricing.

14. Describe how the EVV solution for personal care service that must be implemented in 2019 could be expanded to accommodate the 21st Century Cures Act home health care service EVV requirement by January 1, 2023.

The core concept of our EVV solution for implementation in 2019 is utilizing currently available technology (smartphone) with apps that can be easily changed as technology continues to migrate.

15. Describe the different means of communication (e.g., notifications) the system is capable of producing such as letters, e-mail, text, and phone in multiple language formats for visually and hearing disabled including large font, braille, and audio text.

We believe the ultimate solution for EVV services in California can be a combination of a new mobile phone app on the front end from MorphoTrust integrated into the current CMIPS backend. All of the various communications would therefore be coming from CMIPS to providers and recipients and as CMIPS evolves so would the communication methodology.

16. Describe how your system is kept current and how it keeps up with technology changes.

Since our proposed solution is based on mobile phone technology (both iOS and Android) it will continue to operate with these devices as the technology continues to change. As new features and functions are added, the MorphoTrust EVV app will continue to be updated and be available to Providers allowing them to keep current.