

This proposal contains proprietary information related to Nelnet's business practices, personnel, clients, and vendors. A redacted copy is provided so that proprietary information can be excluded from public posting.

ATTACHMENT 3

REQUIRED BIDDER RESPONSES

1.	<p>Describe your understanding of the business requirements, including reporting requirements. Describe your approach of how you will accomplish the business and reporting requirements.</p> <hr/> <p>Bidder's Response:</p> <p>Nelnet Government Services, LLC (Nelnet) has thoroughly reviewed, understands, and will deliver the requirements to provide Nebraska Department of Health and Human Services (DHHS) a full-service contact center, back-office processing, and mail fulfillment solution for ACCESSNebraska. Our qualifications and strengths offer DHHS a high-value solution to serve its customers. Detailed explanations of Nelnet's key strengths are provided throughout this response, as indicated.</p> <ul style="list-style-type: none"> • Our approach to quality confirms compliance with all applicable laws and regulations. We will collaborate with DHHS to determine the expectations for our associates providing services on this project. Refer to our response to question 9 for information regarding our quality program. • Throughout multiple training phases, our trainers develop associates who are experts for our clients. Refer to our response to question 12 for information regarding our training team and process. • The Nelnet Print and Mail Center is a secure facility that will protect DHHS and customer data and manage all DHHS's print and mail needs. Refer to our response to questions 5 and 7 for information regarding our mail fulfillment capabilities. • Nelnet has the flexibility and capacity to scale to meet DHHS's call needs. Refer to our response to question 11 for information regarding our telephony solution. • DHHS will have access to regular, detailed reports of our associates' performance on the ACCESSNebraska project. Refer to our response to questions 14 and 15 for information regarding our reporting capabilities and metrics. • Our work in highly regulated industries drives our focus on all aspects of privacy and data security. Refer to our response to questions 2 and 6 for our security approach.
2.	<p>Describe your site security and how you will maintain security for remote workers. Both physical and technology security.</p> <hr/> <p>Bidder's Response:</p> <p>All Nelnet associates are based in the U.S., with the majority safely and productively working from home. Remote associates use secure hardware/software packages to ensure data security, effective monitoring, quality assurance, and compliance processes. All associates are required to review and acknowledge Nelnet's Work At Home policies, which provide a detailed listing of security requirements and expectations including the following.</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>Nelnet employs a comprehensive security program to provide the highest degree of protection for sensitive information; our technical solutions comply with National Institute of Standards and</p>

	<p>Technology (NIST) guidelines. Nelnet has established policies and procedures to help us maintain our clients' trust.</p> <ul style="list-style-type: none"> • Security Management and Compliance. We monitor ongoing cybersecurity compliance through a robust security management and compliance program. • Physical Security. Physical and environmental protection controls within Nelnet facilities protect personnel, equipment, networks, and data from events that could cause serious loss or damage. Remote associates must remain compliant with these practices. • External Boundary/Perimeter Protection. Devices monitor and control external communications to prevent and detect malicious and unauthorized communication. • Network-Based Security Controls. We use multiple layers of defense to enable authorized user access, while detecting, containing, isolating, and blocking malicious activities. • Application Development Security. Application security protects Nelnet's systems and data from malicious activity and ensures authentication verification of all users.
3.	<p>Describe your language capabilities, including the percentage of call center staff who are bilingual in English and Spanish, and any other languages available. Describe how you will ensure that call center staff are able to communicate with individuals in multiple languages.</p> <p>Bidder's Response:</p> <p>Our contact center employs more than 90 customer service-focused associates who speak both English and Spanish. This capacity is based on call distribution and business need with a focus on providing the same high-quality performance and experience for all customers. We currently provide bilingual contact center support in the highly regulated, complex federal student loan servicing environment.</p> <p>Nelnet will provide DHHS's required 10 percent bilingual staff prior to the contract start date, delivering on our established capabilities by leveraging our years of experience recruiting, staffing, and training bilingual roles.</p> <p>Direct access to a nationwide labor market allows Nelnet to draw from a diverse pool of talented applicants to prioritize English-speaking and bilingual contact center associates and rapidly fill the positions needed to best serve DHHS's customer base. In addition, we will contract with a vendor that supports over-the-phone translation services, drawing from a pool of more than 5,000 interpreters speaking more than 250 distinct languages.</p>
4.	<p>Describe your experience handling Personal Protected Information (PPI) and Health Insurance Portability and Accountability Act (HIPAA) information, including any HIPAA training that employees have previously received. If you are a covered entity under HIPAA, please provide the number of breach notifications you reported to Office of Civil Rights in the last 3 years. If you are a business associate under HIPAA, please provide the number of security incidents which required notifications to Office of Civil Rights for any covered entities for which you are a business associate in the last three (3) years.</p> <p>Bidder's Response:</p> <p>Under the previous contracts with DHHS, Nelnet executed the necessary Health Insurance Portability and Accountability Act (HIPAA) training for more than 500 associates who completed the University of Nebraska Medical Center HIPAA training.</p> <p>While Nelnet is not a Covered Entity under HIPAA and does not currently process Protected Health Information, we have extensive experience protecting sensitive and confidential information as an employer of more than 7,000 associates across Nelnet, Inc., and as a highly regulated financial services provider for more than 18 million customers. Since 2010, Nelnet has protected confidential information for the federal government under our total and permanent disability (TPD) servicing contract (refer to the TPD Program Support for the U.S. Department of Education section of Nelnet's technical proposal for additional information). This contract requires associates to review documentation from physicians, the U.S. Department of Veterans Affairs, and the Social Security Administration around disabilities to determine program qualification.</p>

	<p>Nelnet places a heavy emphasis on all aspects of privacy and data security.</p> <ul style="list-style-type: none"> • Current in-house associate trainings focus on the Gramm-Leach-Bliley Act, European Union General Data Protection Regulation, California Consumer Privacy Act, Right to Financial Privacy Act, Fair Credit Reporting Act, U.S. and Canadian anti-spam laws, and other applicable privacy requirements. • Privacy training also includes Nelnet’s operational procedures, which require privacy measures that are tailored to the nature and sensitivity of the information used in each process, minimizing risk of privacy breaches or other incidents. • Nelnet’s security training includes requirements for secure handling of information to ensure consumer privacy, such as cybersecurity and privacy training, information governance training, Information System Security Officer training, cybersecurity phishing training, workplace safety awareness training, and cybersecurity Internet of Things training. <p>As a business associate under HIPAA, no security incidents have occurred in the last three years. All new associates hired to support DHHS will complete HIPAA training and continue to uphold Nelnet’s record of quality and confidentiality.</p>
5.	<p>Describe how you will securely print and mail documents.</p> <p>Bidder’s Response:</p> <p>The Nelnet Print and Mail Center in Madison, Wisconsin, is a secure premises, and it will fulfill all DHHS’s print and mail needs. Only immediate team members and associates designated to have direct daily business are granted access to enter the facility. Access reports are reviewed on a regular basis to confirm access remains limited to those associates. All data is managed in accordance with Nelnet’s strict personally identifiable information (PII) protocol; physical mail and all to-be-recycled documents are securely handled only by designated staff.</p> <div style="background-color: black; width: 100%; height: 80px; margin-top: 10px;"></div> <div style="background-color: black; width: 100%; height: 60px; margin-top: 10px;"></div>
6.	<p>Describe how you will ensure that any data resulting from services provided is properly secured according to the requirements in this RFP and is not used, accessed, or disseminated by any method or for any reason not authorized by DHHS.</p> <p>Bidder’s Response:</p> <p>Cybersecurity is embedded in every part of our solution—from the physical security elements within our buildings and the hiring and training of staff, to data protection, project management practices, and subcontractor relations. Nelnet will complete a daily system purge of the previous day’s call recordings to confirm potentially sensitive information remains secure.</p> <p>In all areas, we ensure that access to Nelnet’s infrastructure and resources (e.g., team members, technology, and data) is properly guarded.</p> <ul style="list-style-type: none"> • Tried and true cybersecurity governance ensures compliance, at a minimum, with the Federal Information Security Management Act (FISMA), NIST Special Publication (SP) 800-53, Federal Information Processing Standards (FIPS), and Federal Risk and Authorization Management Program (FedRAMP) standards, and all cybersecurity regulations and mandates.

	<ul style="list-style-type: none"> • An established defense-in-depth approach to cybersecurity ensures consistent and optimized security features built in at all layers, from infrastructure to application security. Within this approach, our Security Operations Center detects, analyzes, and responds to cybersecurity incidents using a combination of technology solutions and processes. • A security-driven design approach to systems development and management ensures that all development and management tools, including project management, version control, code repositories, DevSecOps management, monitoring, and cybersecurity are identified as part of our technical solution and in the system security boundary.
7.	<p>Describe your ability to meet the facility requirements for the printing functions?</p> <p>Bidder's Response:</p> <p>The Nelnet Print and Mail Center is a 23,000-square-foot facility dedicated specifically to the high-speed production of print, sort, and mail solutions for internal Nelnet transactional print and mail production. The secure premises is protected with security cameras, and only associates assigned to the daily business needs of this facility have access to the building. In our facility:</p> <ul style="list-style-type: none"> ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED] ■ [REDACTED]
8.	<p>Describe your approach to workforce planning, including the speed, agility, and flexibility necessary to match your workforce to the fluctuating demand of this contract. Response should include a description of equipment provided to staff.</p> <p>Bidder's Response:</p> <p>To support DHHS's objective of providing high-quality service within a dynamic resource model, Nelnet leverages our decades of historical experience staffing and managing contact centers and delivering high-quality customer experiences. Our methodology (Figure 1) involves sophisticated people, processes, and technology solutions to enable delivery with the speed, agility, and flexibility needed to successfully execute on DHHS's stated performance objectives.</p>

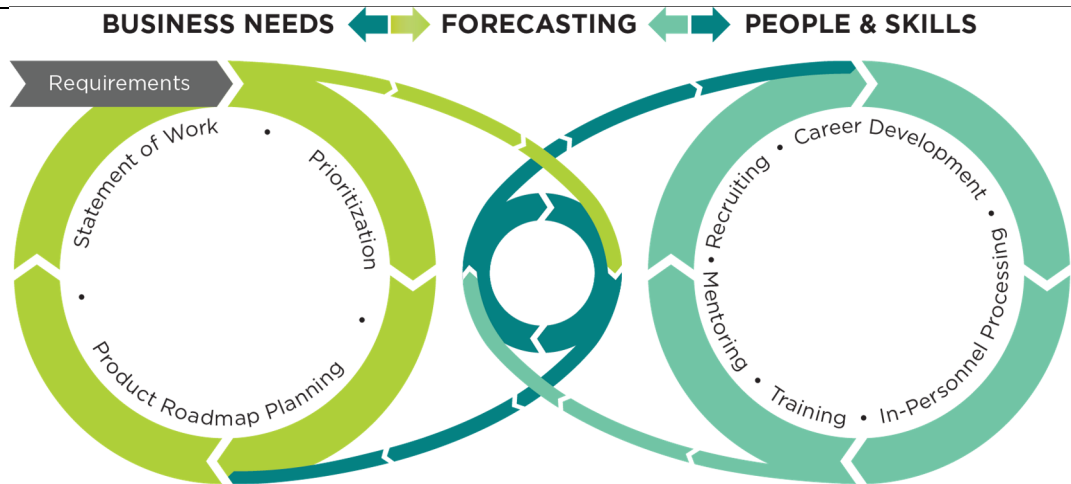


Figure 1. Workforce Management Methodology. Nelnet maintains a comprehensive staffing model to predict operational and technical demands based on accurate staffing forecasting and recruiting and hiring the right people with the right skills. We leverage our staffing model to align operational and technical demands with the appropriate number of resources to positively impact customer experiences.

People

Nelnet employs an extensive and sophisticated recruiting infrastructure that includes attractive wages and benefits and a commitment through our corporate values to *provide an awesome work environment*. We use multiple channels to advertise and promote our job openings nationwide, providing substantial speed and flexibility for achieving hiring objectives. In the third quarter of 2022, **we successfully filled open contact center positions within 18 days on average.**

We also look strategically at the type of associate (e.g., full time, part time, temporary, etc.) that provides the greatest value to meeting the stated performance objectives. We aim to find exceptional talent and create operational flexibility, while providing superior customer experiences. **To maintain a local solution for DHHS, we will make Nebraska-based recruiting and hiring a priority.**

Our recruitment efforts feed an extensive training program to build new associates’ skills, while our leadership development program offers career growth and increased operational experience.

Process

Nelnet uses multiple workforce planning forecasting processes, centered on the duration, business needs, and current operational state, to confirm we are positioned to meet and exceed the performance expectations of our clients and customers.

[REDACTED]

The technologies used to achieve these solutions include [REDACTED], as the primary platform for staffing, shift and schedule management, and metric management. For recruiting purposes, Nelnet uses [REDACTED] and its [REDACTED].

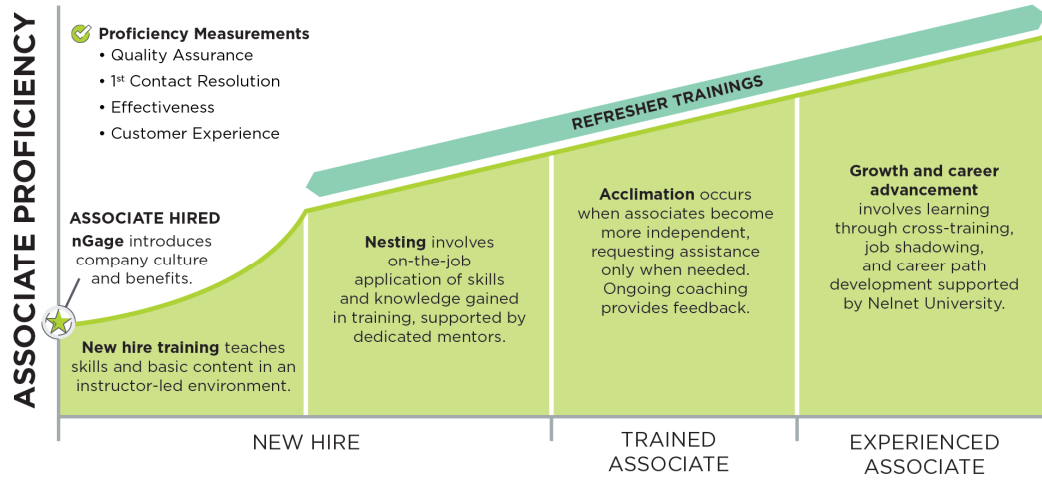
These tools facilitate and augment data storage and usage within a collaborative process discussion with multiple stakeholders. Our experience shows that a unified discussion on approach, goals, and

	<p>strategies streamlines the staffing process, eliminating opportunities for confusion and verifying successful execution of our clients' needs.</p> <p>Technology All associates are provided with a secure thin client to access necessary systems, dual monitors, keyboard, mouse, and a headset for high call quality. The software solutions are built and installed so associates can deliver service with exceptional speed and agility.</p> <p>Nelnet's experience in hiring and onboarding associates has shown that having a sound technical solution and onboarding experience is critical to the long-term retention of associates. We have invested resources in scalable, repeatable technology solutions that enable associate success.</p>
9.	<p>Describe your quality monitoring processes.</p> <p>Bidder's Response:</p> <p>Nelnet has an established Quality Management Oversight program that encompasses overall quality management and potential risks, documented policies and procedures, quality planning, quality assurance, quality control, continuous improvement, risk identification, and risk remediation. This system offers a holistic approach to overseeing activities and tasks needed to maintain the desired level of excellence and customer satisfaction.</p> <p>The quality team consists of approximately 200 highly skilled specialists, analysts, and leaders with an average tenure of 7.5 years. The team's mission is to confirm all activities performed in the contact center environment create a positive customer experience and exceed client expectations. We will leverage the team's expertise, assigning DHHS dedicated quality team members to monitor and review associate interactions. Nelnet will use DHHS's quality scoring sheet, review the required monthly four calls per associate, and calibrate the quality scoring with DHHS.</p> <p>We will begin by meeting with DHHS to determine expectations for all associates, review scorecard metrics, and align key performance indicators (KPIs) for review. These metrics are shared with contact center supervisors, who monitor and review associate calls for accuracy.</p> <p>Our quality team's methodology measures quality and accuracy to confirm compliance with laws and regulations. Interactions are scored for detail and accuracy, as well as tone and other soft skills, based on standards defined in quality assurance guides created in collaboration with DHHS. The results of quality reviews are communicated to the associate and their leadership on a weekly basis, and quality scores are a significant factor on associate monthly performance scorecards. Additional coaching may be necessary, depending on the frequency and severity of any issues noted in the contact. Further analysis of all reviews is completed to identify trends and opportunities for improvement.</p>
10.	<p>Describe your ability to meet the timelines established in this RFP for reporting and quality monitoring.</p> <p>Bidder's Response:</p> <p>Nelnet is fully prepared to meet all timelines identified for DHHS reporting and quality monitoring requirements. We will leverage our 40-plus years of experience delivering business process outsourcing (BPO) solutions, as described throughout Nelnet's technical proposal, to keep DHHS informed of our associates' performance. For more information on our reporting capabilities, refer to our response to question 14.</p>
11.	<p>Describe your maximum call capacity and the timeframe required to increase call capacity.</p> <p>Bidder's Response:</p> <p>Nelnet's current call capacity is 3,800 concurrent calls. Our cloud-based solution with [REDACTED] allows us to scale as needed beyond 3,800 concurrent calls within one day.</p>

Describe your capacity of in-house trainers and approach to on-boarding new call center staff to the project.

Bidder's Response:

Nelnet has more than 60 trainers who will build an onboarding program that promotes speed and agility when bringing on new associates. We will develop an onboarding plan (Figure 2) that confirms our associates become experts for DHHS, with multiple stages of review and reinforcement.



12.

TRAINING PHASES

Figure 2. Onboarding, Training, and the Path to Success. Through our system of ramp-up instruction and regular refreshers, our associates follow a smooth, effective path to becoming experts for our clients.

Nelnet uses a learning management system that supports large-scale hiring initiatives, as well as ongoing, specialized compliance and skills training for associates. We employ a variety of training techniques including:

- Interactive facilitation (i.e., classroom-style training).
- Role-based training with hands-on training and mentoring programs.
- Soft skills training, empowering associates to deliver positive customer experiences.
- Computer-based training in a system that tracks completion rates and quiz scores.
- Webinars.

These varied and easily scalable approaches help us engage with associates and provide flexibility for different learning styles and work environments (e.g., on-site or remote from a home office). This multichannel approach to training also allows us to quickly pivot during times of change or uncertainty.

Once an associate completes their initial training, Nelnet uses a hands-on approach to monitor calls and coach associates. This process includes:

- Knowledge checks and regular weekly quizzes.
- Post-call review and discussion.
- Regular team meetings to discuss challenges and best practices.

Describe your staff retention policies and the average employee length of service.

13.

Bidder's Response:

Having a sound technical solution and onboarding experience is critical to the long-term retention of associates, and Nelnet has invested resources in scalable, repeatable technology solutions that enable associate success. Our core values to *provide superior customer experiences and create an*

	<p><i>awesome work environment</i> help to shape our culture. During the onboarding process, associates learn about Nelnet’s history, the customers we serve, and the various programs we offer for associates’ professional and personal development. Nelnet also offers a mentorship program for all associates, on demand training courses, access to Nelnet University’s eLibrary, and a variety of Associate Resource Groups to keep associates engaged and learning.</p> <p>Nelnet associates participate in our annual [REDACTED] culture survey. This past year, 90 percent of Nelnet associates participated in the survey, resulting in a 77 percent engagement score. Information gathered from the survey is shared with associates, and both leaders and associates devise a plan to improve performance for the coming year.</p> <p>The average tenure of Nelnet associates is 5.9 years, and 3.1 years for our contact center associates. For this opportunity, supervisors will meet with each associate regularly to discuss overall performance, growth opportunities, call review feedback, and overall coaching. Refer to our response to question 9 for more information regarding our quality monitoring process.</p>
14.	<p>Describe your ability to meet the reporting requirements set forth in Section V.C.2. including ad hoc reporting capabilities.</p> <p>Bidder’s Response:</p> <p>Nelnet recognizes the importance of transparency in a BPO solution, and offers frequent and detailed reports to our clients. For DHHS, we will send reports via email and create a real-time dashboard, enabling DHHS to review metrics and reports at any time. The following contact center metrics will be included with each report.</p> <ul style="list-style-type: none"> • Daily report with the number of offered and the number of handled calls, average speed of answer, and average handle time by queue • Daily report with the number of completed items by category (Change Requests (CRs), applications, application status, denial status inquiries from contractor’s customer relationship management (CRM) system) • Daily report for outreach activities including: <ul style="list-style-type: none"> ○ Number of outreach activities per hour, per associate ○ Average talk time per outreach ○ Most frequently asked questions/topics of concern ○ Most frequently used resources ○ Number of outreach actions completed per hour/day/week ○ Number of voicemails left ○ Number of repeat callers • Ad hoc outreach statistic reports as requested • Daily report with the quantity of calls or tasks completed for any other assigned work types • Weekly report of quality assurance monitoring metrics <p>Our analytics team is also available for ad hoc reporting as needed, including comprehensive call data reports and associate-level performance metrics. Additional metrics can be designed in collaboration with DHHS. Simple requests can be provided within the same day, while reports that are more complex may require more time to process.</p>
15.	<p>Describe how DHHS staff will access your Automated Call Distribution (ACD) software to view real-time wait times and available call capacity.</p> <p>Bidder’s Response:</p> <p>Nelnet will grant designated DHHS users access to a real-time dashboard that will display the required service level metrics. The platform is a cloud-based system that users can be provisioned in, and they can access the system from their current environment.</p>
16.	<p>Do you use an off the shelf Customer Relationship Management system, or one developed in house? If off the shelf, please specify the product and company. Please describe the capabilities of the Customer Relationship Management systems in use.</p>

Bidder's Response:

Nelnet uses [REDACTED], an off-the-shelf product that offers customized capabilities based on business needs, for our CRM. [REDACTED] offers the ability to track inbound and outbound customer calls, create and track service levels, manage performance and productivity. Nelnet will work with DHHS during project planning to customize the system to meet DHHS's needs, and verify after go-live that DHHS can track and access all required information.